

**United States District Court  
Eastern District of Michigan  
Southern Division**

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CRYSTAL CURTIS Duly Appointed Personal Representative for the Estate of  
Michael Contrell Adams, deceased

Plaintiff,

Case No: 2:21-cv-12342-JLJM-JJCG  
Hon. Shalina J. Kumar  
Magistrate Judge J. Grey

v.

CITY OF DETROIT, a municipality, Chief James White, Police Officer EUGENE  
FIELDER and Police officer John Doe, in their individual and official capacity,  
Jointly and Severally,

Defendants.

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DAVID A. ROBINSON (P38754)  
BRANDON MCNEAL (P81300)  
Attorneys for Plaintiff  
28145 Greenfield Rd., Ste. 100  
Southfield, MI 48076  
(248) 423-7234  
[davidrobinsonlaw@gmail.com](mailto:davidrobinsonlaw@gmail.com)  
[mcnealbr@gmail.com](mailto:mcnealbr@gmail.com)

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CRYSTAL B. OLMSTEAD (P69202)  
City of Detroit Law Department  
Attorneys for Defendants, City of  
Detroit and Joshua Davis  
2 Woodward Ave., Suite 500  
Detroit, MI 48226  
(313) 237-5035 (direct)  
(313) 237-0543 (sec. Renee Draper)  
[olmsteadc@detroitmi.gov](mailto:olmsteadc@detroitmi.gov)  
[draperr@detroitmi.gov](mailto:draperr@detroitmi.gov)

THOMAS E. KUHN (P37924)  
Co-Counsel for Plaintiff  
645 Griswold Street, Ste. 1900  
Detroit, MI 48226  
(313) 963-5222 / (313) 963-9061 (F)  
[tekuhn@aol.com](mailto:tekuhn@aol.com)

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**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO AMEND**  
**WITNESS LIST**

**I. PLAINTIFF HAS BEEN AWARE OF THIS WITNESS SINCE THE INCEPTION OF THIS LAWSUIT.**

Plaintiff's Motion to Amend the Witness List to Add Talaya Johnson includes blatantly false statements. Plaintiff claims in **ECF No. 95 PageID.943** that "Plaintiff did not have any contact information or knowledge of this witnesses' observations until Detective Richard Sanchez located her and took her statement... As of August 30, 2023, Plaintiff had no information to locate this witness." However, this is contrary to the very statements made by the witnesses interviewed by Lieutenant Richard Sanchez—Jade Colon and Talaya Johnson.

On July 5, 2023, Lieutenant Richard Sanchez interviewed Jade Colon. As a matter of background, Jade Colon and Tayla Johnson were allegedly present at the drag racing event that is the subject of this lawsuit. They are best friends and rode together in the same grey Pontiac G6. This vehicle was allegedly parked two cars ahead of Defendants' undercover vehicle. They claim that they were present and witnessed the shooting. Both claim that the deceased fell into them and that they were covered in blood. Both also claim that they went to a gas station to get paper towels to wash the blood off themselves. Ms. Colon claims that she gave Mr. Robinson a white COACH purse to swab for blood and she provided him with photographs. The relevant videos will be provided if the court accepts the Motion

for Leave to File Video. **(Proposed Exhibit A: Jade Colon Interview.)** At 6:55 Ms. Colon indicates that Ms. Johnson “was involved in the case at first, but she has PTSD” She indicates that herself and Ms. Johnson contacted Plaintiff.

At **16:50 -18:45** she describes her interactions with both Plaintiff and Mr. Robinson. She indicates that she got contacted by a lawyer. She indicates that she talked to the mom, and the mom wanted to make sure that she talked to the lawyer. She specifically mentions Mr. David Robinson. She stated that the mom put her on the lawsuit for emotional damages. She indicated that she did a walkthrough with the attorney *last year* (2022) and one on the *same year* (2021).

On July 5, 2023, Lieutenant Sanchez also interviewed Tayla Johnson. Ms. Johnson indicated that Jade Colon was with the attorney, and they contacted her. She stated that the attorney asked her about the gas station that she went to wash the blood off her body. She indicated that she tried to direct him to the gas station. She said this conversation occurred about a year ago (July of 2022). **Proposed Exhibit B: Tayla Johnson Interview.**

Hence, there is zero truth in the statement that Plaintiff has had no knowledge of this witness prior to September of 2023. In fact, Plaintiff is simply again intentionally hiding witnesses and trying to spring them on Defense at the last minute. As the court may recall, on September 22, 2022, the City filed a motion to strike witnesses Brooklyn Ostrowski and Jacob Platt due to Plaintiff’s

failure to disclose them in her Initial Disclosures. **ECF No. 43.** Plaintiff stated in her response brief that she withheld the witnesses because she was concerned that the Detroit Police Department would harass, threaten, “or worse,” the witnesses.

**ECF No. 49, PageID.548** At the hearing on the motion, the Court denied the City’s motion to strike those witnesses and gave Plaintiff the benefit of the doubt. The Court pointed out that if Plaintiff had any such concerns, **she should bring them to the court, not violate the court rules.**

But low and behold, even at that hearing, Plaintiff was still hiding additional witnesses. Further, The Plaintiff provided false testimony under oath during her deposition. The City deposed Plaintiff Crystal Curtis this year on April 11, 2023. This writer *specifically* asked Ms. Curtis if she knew of *any additional witnesses to* the shooting. She denied any knowledge of any other witness. This was clearly a *falsehood*. The interaction follows:

Q. Okay. So I asked you -- well, actually, I sent to  
19 your attorney some requests for admissions regarding  
20 any witnesses to the shooting, and the only witnesses  
21 that -- and that was September, I believe,  
18 September 18th of 2022, that Mr. Robinson provided  
20 answers on your behalf. And he stated that the  
21 witnesses to this incident were a Brooklyn Ostrowski  
22 and a Jacob Platt or Pratt, I believe. Is that  
23 correct?

24 **A. I guess.**

25 Q. Okay. Do you know of any other witnesses other than  
26 those two individuals?

**1 A. No.  
(Exhibit C: Plaintiff's Deposition).**

**WRITTEN DISCOVERY**

On August 20, 2022. the Defendants served Requests for Admissions on Plaintiff. [ECF No. 40, PageID.373](#). The requests asked Plaintiff to admit that they had no witnesses to the shooting other than Officer Jetter and Fielder. Plaintiff's response denied the request and identified Brookly Ostrowski and Jacob Platt.

The City also served Interrogatories and Requests for Production of Documents On August 22, 2022. The Interrogatories specifically requested that Plaintiff identify any witness to the shooting that she intended to call at trial. Plaintiff responded to both discovery requests on September 18, 2022. Plaintiff did not disclose either Jade Colon or Tayala Johnson despite being well aware of both. Relevant portions of the Interrogatories follows:

**2. Please identify any witnesses you are aware of that witnessed the shooting of Michael Adams that you intend to produce for trial. In reference to each witness state the following:**

- A. Full name, current address, and telephone number of each witness
- B. How you became aware of this witness
- C. What the witness claims that he/she/they observed

**ANSWER:** Defense counsel has deposed both Brooklyn Ostrowski and Jacob Pratt and has their contact information. Defense counsel also has Christopher Harris's contact information. Defense knows what these witnesses testimony may be as it is contained in deposition or police report. As discovery is continuing other witnesses will be identified. Defense can reference Plaintiff's witness list for the names of proposed witnesses.

**(Exhibit D: Interrogatories to Plaintiff)**

Plaintiff filed her witness List on August 30, 2022. This witness List included one hundred and ninety-three individuals. This list is so vague it even identifies, “The black man in the hospital.” ECF No. 37 PageID.764. The list included no addresses, telephone numbers or anticipated testimony as required by FRCP 26(3)(a). Ms. Colon is listed as entry number 156. PageID.763. Ms. Johnson was not included. Nor, did Plaintiff include Ms. Colon on her Initial Disclosure or update her Initial Disclosures as required by FRCP 26.

**(e) Supplementing Disclosures and Responses.**

**(1) In General.** A party who has made a disclosure under Rule 26(a)--or who has responded to an interrogatory, request for production, or request for admission--must supplement or correct its disclosure or response:

**(A)** in a timely manner if the party learns that in some material respect the disclosure or response is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing; or

**(B)** as ordered by the court.

Further, the Federal Rules of Civil Procedure and case law *requires* trial courts to punish parties for failing to produce witnesses by excluding those witnesses unless the party that failed to produce the witness can show that the failure was substantially justified or harmless. *PNC Equip Fin v Mariani*, 758 Fed Appx 384, 389 (CA 6, 2018)

Plaintiff is likely to state that her intentional hiding of witnesses is no big deal since the parties can simply take the depositions, but discovery is over in this case.

Motions deadline is approaching. Plaintiff had every opportunity to identify witnesses to the shooting, but choose to hide them. Plaintiff should not be allowed to benefit from behavior that is *intentional and habitual*.

WHEREFORE, Defendants, respectfully requests that this Honorable Court deny plaintiff's motion to amend witness list.

Dated: October 30, 2023

Respectfully submitted,

/s/ Crystal B. Olmstead  
Crystal B. Olmstead P69202  
City of Detroit Law Department  
Attorneys for Defendants  
Two Woodward Avenue, 5<sup>th</sup> Floor  
Coleman A. Young Municipal Center  
Detroit, Michigan 48226  
(313) 237-5035  
[olmsteadc@detroitmi.gov](mailto:olmsteadc@detroitmi.gov)

#### PROOF OF SERVICE

The undersigned hereby certifies that she served a copy of this Response to Plaintiff's Motion to Amend Witness List on the attorneys of record through the United States District Court Eastern District of Michigan electronic filing system CMECF on October 30, 2023.

/s/ Crystal B. Olmstead

# EXHIBIT A



# EXHIBIT A

# EXHIBIT C

**Crystal Curtis**

**04/11/2023**

UNITES STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

CRYSTAL CURTIS, Duly Appointed Personal Representative  
for the Estate of Michael Contrell Adams, deceased,  
Plaintiff, Case No. 2:21-cv-12342-LJM-JJCG  
vs. Hon. Laurie J. Michelson  
Magistrate Judge Jonathan J.C. Grey

CITY OF DETROIT, a municipality; Chief James White;  
Police Officer John Doe and Police Officer John Doe, in  
their individual and official capacity, Jointly and  
Severally  
Defendants.

\_\_\_\_\_/

The Deposition of CRYSTAL CURTIS,  
Taken at 28145 Greenfield Road, Suite 100,  
Southfield, Michigan,  
Commencing at 10:00 a.m.,  
Tuesday, April 11, 2023,  
Before Susanne Ellen Gorman, CSR-9271, RPR.

**Crystal Curtis****04/11/2023**

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**Pages 2..5**

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1 APPEARANCES:  
2  
3 DAVID A. ROBINSON, ESQ. (P38754)  
4 Robinson and Associates, P.C.  
5 28145 Greenfield Road, Suite 100  
6 Southfield, Michigan  
7 248.423.7234  
8 davidrobinsonlaw@gmail.com  
9 Appearing on behalf of the Plaintiff.

10  
11 CRYSTAL BIANCA OLMSTEAD, ESQ. (P69202)  
12 City of Detroit Law Department  
13 2 Woodward Ave, Suite 500  
14 Detroit, Michigan 48226  
15 313.237.5035  
16 olmsteadc@detroitmi.gov  
17 Appearing on behalf of the Defendants.

18  
19 ALSO PRESENT:  
20  
21 OFFICER JEJUAN JETTER  
22  
23  
24  
25

1 DEFENDANTS' EXHIBIT 8 64  
2 12:02 p.m.  
3 Instagram text written by Ms. Curtis  
4 DEFENDANTS' EXHIBIT 9 65  
5 12:03 p.m.  
6 Instagram text written by Ms. Curtis  
7 DEFENDANTS' EXHIBIT 10 81  
8 12:45 p.m.  
9 Instagram text written by Ms. Curtis  
10 DEFENDANTS' EXHIBIT 11 83  
11 12:50 p.m.  
12 Instagram photo and post by Ms. Curtis  
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	Instagram text written by Ms. Curtis	

1 Southfield, Michigan  
2 Tuesday, April 11, 2023  
3 10:00 a.m.  
4  
5 CRYSTAL CURTIS  
6 was thereupon called as a witness herein and, after  
7 having first been duly sworn to testify to the truth,  
8 the whole truth, and nothing but the truth, was  
9 examined and testified as follows:  
10 MS. OLMSTEAD: Okay. Good morning,  
11 Ms. Curtis.  
12 Let the record reflect that this is the  
13 deposition of Crystal Curtis taken pursuant to notice  
14 and for all reasons pursuant to the court rules.  
15 Ms. Curtis, have you ever had your  
16 deposition taken before?  
17 THE WITNESS: Yes.  
18 MS. OLMSTEAD: Okay. Well, actually, let  
19 me back up. Can you spell and -- state and spell your  
20 first, middle if you have one, and last name for the  
21 record.  
22 THE WITNESS: Crystal, C-r-y-s-t-a-l. Eve,  
23 E-v-e. Curtis, C-u-r-t-i-s.  
24 MS. OLMSTEAD: Okay. So you have had your  
25 deposition taken before. What was the -- were the

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1 circumstances of that deposition?  
 2 **THE WITNESS: A --**  
 3 MR. ROBINSON: Objection. Relevance.  
 4 **THE WITNESS: -- car accident.**  
 5 MS. OLMSTEAD: How long ago was that?  
 6 **THE WITNESS: 2019.**  
 7 MS. OLMSTEAD: Okay. Well, anyway, I just  
 8 want to go over the rules, since it's been a few years  
 9 since you have had your dep taken. You have sat  
 10 through a couple of the other deps, so you kind of  
 11 know the deal. Our court reporter here is taking down  
 12 everything that I say. She'll be taking down  
 13 everything you say. She'll take down any objections  
 14 that your attorney may have; and so it's important  
 15 that you let me finish my question before you attempt  
 16 to answer.  
 17 It's important that -- for that purpose --  
 18 so that the court reporter can get a clean record.  
 19 It's my only opportunity to speak with you prior to  
 20 the trial, so after you leave here today, I won't  
 21 really have the opportunity to say -- to clean up the  
 22 record. So, also, the most important thing I always  
 23 say in a deposition -- I'm not always clear, so if I'm  
 24 not clear and you don't understand the question that  
 25 I'm asking, simply say, "Crystal, I don't understand

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1 the question."  
 2 Excuse me for a second.  
 3 (Off the record at 10:17 a.m.)  
 4 (Back on the record at 10:19 a.m.)  
 5 MS. OLMSTEAD: So, as I was saying, just  
 6 say, "Crystal, I don't understand your question," and  
 7 I'll do as best I can to rephrase the question in a  
 8 way that you do understand. The reason I really like  
 9 to stress that is that once you leave here, again, you  
 10 can't go back and say, "Well, I didn't understand the  
 11 question." And if you give an answer, I'll assume  
 12 that that was a knowing, accurate, and knowledgeable  
 13 answer. Fair enough?  
 14 **THE WITNESS: All right.**  
 15 EXAMINATION  
 16 BY MS. OLMSTEAD:  
 17 Q. All right. What is your current address?  
 [REDACTED]  
 20 Q. That's the east side?  
 21 A. **Borderline.**  
 22 Q. Okay. And were you living there on the date of the  
 23 incident that we're here about today? That would be  
 24 August -- the early morning hours of August the 9th.  
 25 A. **Yes.**

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1 Q. Yes? Okay. And at that time, was your son Michael  
 2 Adams, living at that address as well?  
 3 A. **Yes.**  
 4 Q. Okay. Who else was living there?  
 5 A. **My children and my husband.**  
 6 Q. What's your husband's name?  
 7 A. **Tremain Curtis.**  
 8 Q. Can you spell that for me.  
 9 A. **T-r-e-m-a-i-n.**  
 10 Q. No E at the end?  
 11 A. **No.**  
 12 Q. Okay. How old is Mr. Curtis?  
 13 A. **Thirty-five.**  
 14 Q. Thirty-five. Okay. And it's my understanding that  
 15 Michael Curtis was your oldest child?  
 16 A. **Michael Adams.**  
 17 Q. Sorry. Michael Adams was your oldest?  
 18 A. **Yes.**  
 19 Q. Okay. And what's your next oldest?  
 20 A. **Christopher Adams.**  
 21 Q. How old is Christopher?  
 22 A. **He just turned 18.**  
 23 Q. And what's your next oldest, if you have any more?  
 24 A. **Omri Singleton, O-m-r-i.**  
 25 Q. O-m-r-i? How old is Omri?

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1 A. **He's 14.**  
 2 Q. Any additional children?  
 3 A. **Ny'Jai Singleton, N-y, accent mark, capital J-a-i,**  
 4 **she's 13. Are we just talking about my biological or**  
 5 **also my stepson that lives there?**  
 6 Q. Yeah, everyone who lives there.  
 7 A. **Camren Hodge, he is 13. C-a-m-r-e-n. This is how you**  
 8 **spell his name.**  
 9 Q. C-a-m- --  
 10 A. **C-a-m-r-e-n.**  
 11 Q. Okay. Let me make sure I got that right.  
 12 C-a-m-a-r-e-n?  
 13 A. **No. -r-e-n.**  
 14 Q. Oh, so no E in there. Okay. Any additional children  
 15 living in the house?  
 16 A. **Tremain Curtis, Jr.**  
 17 Q. Okay. How old?  
 18 A. **He's 10.**  
 19 Q. Any additional?  
 20 A. **Kai'Lee, K-a-i, accent mark, capital L-e-e Curtis;**  
 21 **Kai'Lynn Curtis, K-a-i, accent mark, capital L-y-n-n.**  
 22 **Wow. They're twins. They're seven.**  
 23 Q. Okay. So Mr. -- I'm sorry. Tremain Curtis is your  
 24 husband. Who is -- what's Michael's father's name?  
 25 A. **Michael Adams.**

Crystal Curtis

04/11/2023

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1 Q. Okay. Do you have his address?  
 2 **A. No.**  
 3 Q. Do you have a phone number for him?  
 4 **A. No. I don't talk to him.**  
 5 Q. So when was the last time that you saw Michael, your  
 6 son Michael?  
 7 **A. Oh, I'm like, "Which Michael?" I saw him August 8th.**  
 8 Q. Okay. And where did you see him at?  
 9 **A. Outside.**  
 10 Q. Outside of where?  
 11 **A. Our complex.**  
 12 Q. And what was he doing?  
 13 **A. Riding a go-kart with the other guys in the complex.**  
 14 Q. And about what time of day was that?  
 15 **A. About 5:30.**  
 16 Q. Did he own a vehicle?  
 17 **A. No.**  
 18 Q. The others -- so he didn't own a vehicle. Did he  
 19 drive your car to the races that night, or how did he  
 20 get to the races?  
 21 **A. I don't know how he got to the races.**  
 22 Q. Who were the other guys in the complex that he was  
 23 with before he left the last time that you saw him?  
 24 **A. It was a bunch of kids. I don't know exactly their**  
 25 **names. That's something he did.**

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1 Q. Was it his go-kart or someone else's go-kart?  
 2 **A. It was someone else's.**  
 3 Q. I understand, from your answers to interrogatories,  
 4 that Michael was not employed. Is that correct?  
 5 **A. No, he wasn't employed at the time.**  
 6 Q. Okay. What was his last job?  
 7 **A. He worked at -- what's it called? It was a plant. I**  
 8 **don't know exactly the name of it.**  
 9 Q. What year was that?  
 10 **A. 2019 -- 2021.**  
 11 Q. And why did he cease to work at the plant?  
 12 **A. He came in too late too many times, so they let him**  
 13 **go.**  
 14 Q. Okay. Did Michael graduate from high school?  
 15 **A. No.**  
 16 Q. What's the last grade he completed?  
 17 **A. Eleventh.**  
 18 Q. What high school?  
 19 **A. He went to -- what's it called? -- the Covenant**  
 20 **House.**  
 21 Q. What's the Covenant House?  
 22 **A. It's an alternative school.**  
 23 Q. What is an alternative school?  
 24 **A. When they don't complete high school, they go there to**  
 25 **fast-track so that they can get their diploma.**

1 Q. What was the last high school that he went to before  
 2 Covenant House?  
 3 **A. I don't remember.**  
 4 Q. Did Michael have any children?  
 5 **A. No.**  
 6 Q. Was he married or engaged or anything like that?  
 7 **A. No.**  
 8 Q. No girlfriend?  
 9 **A. Uh-uh. No.**  
 10 Q. Okay. So at the time of the shooting, was he -- I  
 11 understand he didn't graduate from high school. Was  
 12 he in any other schools or any program or anything?  
 13 **A. No.**  
 14 Q. Okay. So, typically, how did he spend a typical day?  
 15 **MR. ROBINSON: Object to the form of the**  
 16 **question.**  
 17 **THE WITNESS: It would depend on the day.**  
 18 **BY MS. OLMSTEAD:**  
 19 Q. Did he go to church?  
 20 **A. No.**  
 21 Q. Was he involved in any groups, say, basketball league,  
 22 anything like that?  
 23 **A. No.**  
 24 Q. Did he do any volunteer work?  
 25 **A. No.**

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1 Q. Okay. So it's my understanding that you were not  
 2 present on East Grand and Milwaukee and Trombly, where  
 3 the shooting took place. Is that correct?  
 4 **A. You said I wasn't?**  
 5 Q. Or were you present?  
 6 **A. No.**  
 7 Q. Okay. So how did you first hear about Michael being  
 8 shot?  
 9 **A. A young man came to my door.**  
 10 Q. Who was the young man?  
 11 **A. I don't know 'cause my son answered the door.**  
 12 Q. Which son?  
 13 **A. Christopher.**  
 14 Q. And what did Christopher tell you?  
 15 **A. He said, "Mom, you got to get up. They think Michael**  
 16 **was hit." I was -- like, I didn't know what "hit"**  
 17 **was; so. . .**  
 18 Q. Okay. Did you ask him who -- how he knew this, or who  
 19 came to the door, or anything like that?  
 20 **A. No. I was too worried about Michael.**  
 21 Q. Okay. And so then how did you -- did he tell you  
 22 where you had to go to?  
 23 **A. My son?**  
 24 Q. Yes.  
 25 **A. He said, "The hospital." He's guessing the hospital.**

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1 Q. He guessed the hospital?  
 2 **A. That's what he said.**  
 3 Q. I'm sorry. When you say -- when you're saying he's  
 4 guessing the hospital, are you saying that he was  
 5 guessing that --  
 6 **A. He's guessing that I should go to the hospital.**  
 7 Q. Okay. And so how did you figure out which hospital  
 8 you had to go to?  
 9 **A. I only knew of one hospital that he has ever went to.**  
 10 **It was Henry Ford, so that's the hospital I went to.**  
 11 Q. Who all went to the hospital with you?  
 12 **A. Myself and his best friend, Ty'Juane Morris.**  
 13 Q. Was Ty'Juane at your house that night?  
 14 **A. No.**  
 15 Q. So how did you get Ty'Juane? Did you call him, or did  
 16 he call you?  
 17 **A. No. He pulled up in front of our house. I don't know**  
 18 **how he knew or anything.**  
 19 Q. Did you ask him how he knew?  
 20 **A. No.**  
 21 Q. What's Ty'Juane's address?  
 22 **A. I don't know his address.**  
 23 Q. Do you know his phone number?  
 24 **A. Of course.**  
 25 Q. Can you provide the phone, if you remember, for me,

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1 please.  
 2 [REDACTED]  
 3 Q. [REDACTED]  
 4 **A. Yes.**  
 5 Q. Okay. So do you drive, or does Ty'Juane drive?  
 6 **A. I drive. Or -- see, that's why I'm confused. Are you**  
 7 **saying that night, or are you saying to the hospital?**  
 8 Q. To the hospital. I'm sorry.  
 9 **A. He drove.**  
 10 Q. Does he live in the same complex that you live in?  
 11 **A. No.**  
 12 Q. Okay. So you get to the hospital. What do you -- do  
 13 you ask some of the staff there for your son, or what  
 14 happens next?  
 15 **A. I guess that's the receptionist or the triage people.**  
 16 **I asked them was my son there.**  
 17 Q. And what did they tell you?  
 18 **A. That he was.**  
 19 Q. Okay. And then what happened next?  
 20 **A. Then I say, "Can I see him?"**  
 21 Q. And they let you see him?  
 22 **A. Not at first, no.**  
 23 Q. About what time did Ty'Juane -- excuse me if I'm  
 24 pronouncing that incorrectly. About what time did  
 25 Ty'Juane show up at your house?

1 **A. I don't know the time.**  
 2 Q. Okay. But it was the middle of the night, though;  
 3 right?  
 4 **A. Yes.**  
 5 Q. Okay. Do you know what time you got to the hospital?  
 6 **A. No, I don't.**  
 7 Q. Okay. So how long did the hospital staff at Henry  
 8 Ford make you wait before seeing him?  
 9 **A. Probably about 40, 45 minutes.**  
 10 Q. So then who took you back to see your son? Was it a  
 11 doctor?  
 12 **A. The doctor.**  
 13 Q. And so the doctor explained to you what happened?  
 14 **A. Yes.**  
 15 Q. What did the doctor tell you?  
 16 MR. ROBINSON: Object to form. Hearsay.  
 17 **THE WITNESS: That my son had been shot and**  
 18 **killed.**  
 19 BY MS. OLMSTEAD:  
 20 Q. Okay. And did Ty'Juane go back with you to see him,  
 21 to view him?  
 22 **A. He wasn't able to come back at first.**  
 23 Q. Why not?  
 24 **A. Because he didn't have on proper clothing.**  
 25 Q. What was the proper clothing?

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1 **A. He had on no shirt. He had on shorts. They were**  
 2 **saying that he needed to be clothed, so somebody gave**  
 3 **him a hospital gown to come back.**  
 4 Q. Okay. So what did you observe?  
 5 **A. What do you mean?**  
 6 Q. So you viewed your son. It was him. Did you touch  
 7 him? Did you, like, look at him and observe?  
 8 **A. Of course I touched him.**  
 9 Q. Okay. How long were you back there?  
 10 **A. Hours.**  
 11 Q. Two hours? Three hours?  
 12 **A. I'm not sure. It was hours.**  
 13 Q. Okay. So you eventually left. Did you go back and  
 14 speak with your doctor again or someone else?  
 15 **A. No.**  
 16 Q. You just left the hospital?  
 17 **A. Yes.**  
 18 Q. Where did you go from there?  
 19 **A. To homicide.**  
 20 Q. Homicide, DPD?  
 21 **A. Yes.**  
 22 Q. Where is that located?  
 23 **A. Fort Street.**  
 24 Q. I'm sorry. Fort Street?  
 25 **A. Uh-huh. Yes.**



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1 Q. Who did you speak with there?  
 2 **A. Two officers, one from the state trooper and another**  
 3 **one from DPD.**  
 4 Q. Why did you go to homicide?  
 5 **A. My son had called one of my family members that was**  
 6 **there and told them that someone had came to the house**  
 7 **and they left a card, and I called the number, and**  
 8 **that's how I ended up there.**  
 9 Q. Okay. So -- I'm sorry. Make sure I'm clear on this.  
 10 So your son -- we're talking about Christopher again?  
 11 **A. Yes.**  
 12 Q. -- called someone that was at the hospital? Is that  
 13 what you said?  
 14 **A. Yes, one of my family members.**  
 15 Q. Which family member was that?  
 16 **A. I believe it was my brother, but I'm not sure exactly.**  
 17 **That night was kind of jumbled for me.**  
 18 Q. So someone from DPD Homicide left a card at your house  
 19 indicating for you to call them?  
 20 **A. Yes.**  
 21 Q. Okay. So you go down to homicide. You speak with a  
 22 state trooper and a DPD officer. Were they both men?  
 23 **A. Yes.**  
 24 Q. Was it a White officer? Black officer?  
 25 **A. One White, one Black. The state trooper was White,**

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1 **the DPD was Black.**  
 2 Q. So what did they tell you?  
 3 **A. They didn't tell me anything. They proceeded to**  
 4 **interrogate me.**  
 5 Q. How did they interrogate you?  
 6 **A. They were asking me questions and stating stuff that I**  
 7 **knew nothing of.**  
 8 Q. What kinds of questions, specifically?  
 9 **A. Did I know that my son was driving in the vehicle?**  
 10 **Did I know that my son had a gun? All of these**  
 11 **things.**  
 12 Q. And what did you tell them?  
 13 **A. No, I didn't know any of that.**  
 14 MR. ROBINSON: For the record, I don't want  
 15 there being any misunderstanding. The witness is not  
 16 indicating that she says that her son had a gun.  
 17 **THE WITNESS: Oh, yeah. No, I'm not saying**  
 18 **that at all.**  
 19 MS. OLMSTEAD: Is your objection form and  
 20 foundation?  
 21 MR. ROBINSON: It's -- I just wanted the  
 22 record to be clear. That's all.  
 23 BY MS. OLMSTEAD:  
 24 Q. About how long were you -- did you meet with DPD and  
 25 MSP at homicide?

1 **A. It wasn't that long.**  
 2 Q. Okay. Did they ask you who your son left with that  
 3 night?  
 4 **A. I don't recall them asking me that.**  
 5 Q. Did they show you anything, any video, any reports,  
 6 anything like that?  
 7 **A. No.**  
 8 Q. Did they ask you to do anything, like to call them  
 9 back if you had any information or if you had any  
 10 questions or anything like that?  
 11 **A. I believe they did, and they gave me a booklet.**  
 12 Q. What was the booklet?  
 13 **A. Victim rights, grief counseling. Some other stuff was**  
 14 **in there.**  
 15 Q. Did you use any of those things?  
 16 **A. No.**  
 17 Q. Did they give you a card with their number or to call  
 18 them back, if necessary, or they just told you to use  
 19 the card that you already had?  
 20 **A. It might have been in there. I'm not sure. I didn't**  
 21 **even -- I glanced at the book, and I was done with it.**  
 22 Q. Have you had any other conversations with the DPD or  
 23 anyone from MSP in regards to this incident since that  
 24 first evening?  
 25 **A. Yes.**

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1 Q. Okay. Who did you speak with?  
 2 **A. Sanchez, I believe his name is.**  
 3 Q. An MSP officer?  
 4 **A. I think he is.**  
 5 Q. Sanchez. Yes. Okay. And when did you speak with  
 6 Sanchez?  
 7 **A. Last year.**  
 8 Q. So we're in 2023, so sometime in 2022?  
 9 **A. Yes.**  
 10 Q. Do you recall if it was spring of 2022? Winter of  
 11 2022? Summer 2022?  
 12 **A. I don't recall, but I know that I had on a jacket;**  
 13 **so. . . That's all I know.**  
 14 Q. Where did you meet him at?  
 15 **A. At the Fisher Building, I want to say. I believe**  
 16 **that's the Fisher Building.**  
 17 Q. Is there a particular office name there that you went  
 18 to? Was it his office or --  
 19 **A. It was, like, kind of, sort of, like, underground a**  
 20 **little bit. Like, I don't know exactly. It might**  
 21 **have been his office.**  
 22 Q. Was that the spot that he asked you to meet him at?  
 23 **A. Yes.**  
 24 Q. Was anyone else present?  
 25 **A. Yes.**



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1 Q. Who else?  
 2 **A. I believe her name is Molly. I can't think of her**  
 3 **last name.**  
 4 Q. Who is Molly?  
 5 **A. She was a prosecutor.**  
 6 Q. Okay. What was the nature -- sorry. What did you-all  
 7 talk about?  
 8 **A. They just wanted to interview me, to ask me questions.**  
 9 Q. What questions?  
 10 **A. They asked me did I know anything about that night,**  
 11 **did I know who may have been in the vehicle with**  
 12 **him -- with Michael, what phone he had maybe, and that**  
 13 **was about it.**  
 14 Q. And what did you tell them?  
 15 **A. I gave him the phone number that I knew my son had. I**  
 16 **told him I did not know the boys and, no, I don't know**  
 17 **how he left from the house or in the complex, and if I**  
 18 **heard anything, I would let them know.**  
 19 Q. What was the phone number that you gave them?  
 20 **A. I don't know it by heart.**  
 21 (Witness looks through her phone.)  
 22 [REDACTED]  
 23 Q. Do you still have access to the phone?  
 24 **A. To his phone? Yes, I do.**  
 25 Q. Did you ever look at the phone to see who he was

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1 calling that night?  
 2 **A. He never had his phone.**  
 3 Q. He didn't have his phone on him that night?  
 4 **A. No.**  
 5 Q. How do you know that?  
 6 **A. Because I have the phone.**  
 7 Q. So it wasn't in his property?  
 8 **A. No.**  
 9 Q. Did he have another phone?  
 10 **A. No.**  
 11 Q. Was the phone on --  
 12 **A. Yes.**  
 13 Q. -- and activated? When was the last time you saw him  
 14 with the phone?  
 15 **A. August 8th at 5:30.**  
 16 Q. So at 5:30, outside with the kids playing go-kart?  
 17 **A. Yes.**  
 18 Q. Okay. So at some point he came back inside and gave  
 19 you his phone?  
 20 **A. No.**  
 21 Q. So how did you -- he came back in and left the phone  
 22 in his room, or what?  
 23 **A. No.**  
 24 Q. Okay. So how do you have the phone?  
 25 **A. One of his friends needed to use it, and he left it**

1 **with him.**  
 2 Q. One of his friends needed to use it outside with  
 3 the -- at 5:30 with the go-karts?  
 4 **A. I'm not sure when they needed it, but I just know that**  
 5 **a friend brought it to me.**  
 6 Q. When?  
 7 **A. The next day, August 9th, at, like, 6:00 in the**  
 8 **afternoon.**  
 9 Q. Which friend was that?  
 10 **A. Javon.**  
 11 Q. Javon, J-a-v-o-n?  
 12 **A. It might be.**  
 13 Q. Maybe? What's his last name?  
 14 **A. I'm not sure.**  
 15 Q. Does he live in the complex?  
 16 **A. No.**  
 17 Q. Do you have a phone number for Javon?  
 18 **A. No.**  
 19 Q. Did you ask him how he -- you asked him how he came to  
 20 have the phone?  
 21 **A. Yes.**  
 22 Q. And what did he tell you?  
 23 **A. He said he needed to use it, and it died in the midst**  
 24 **of it, so he was charging it for Mike, and Mike never**  
 25 **came back to get it.**

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1 Q. And did he say where he was when Mike -- he needed the  
 2 phone and Mike --  
 3 **A. No, he never told me that. I didn't even think to ask**  
 4 **that.**  
 5 Q. So he could have -- Javon could have been at the races  
 6 with Michael with the phone?  
 7 MR. ROBINSON: Objection. Speculation.  
 8 **THE WITNESS: Might have been.**  
 9 BY MS. OLMSTEAD:  
 10 Q. So I'll go back to my original question. Have you  
 11 looked through the phone to see what calls, what text  
 12 messages might be -- that he may have had around that  
 13 time?  
 14 **A. That he was killed?**  
 15 Q. Yes, during the night, during August the 8th into  
 16 August the 9th.  
 17 **A. Yes, but it wasn't, like, calls for him, so it was**  
 18 **irrelevant to me. Text messages were from people that**  
 19 **was trying to get ahold of him, saying that -- I guess**  
 20 **they had reached them that he had passed away. It was**  
 21 **most of them trying to figure out was it really true.**  
 22 Q. Okay. So you did look at the phone, and the calls  
 23 that you looked at were the calls that came in after  
 24 the shooting?  
 25 **A. Yes.**

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1 Q. Okay. What was the last call or last text prior to  
 2 him going to the races?  
 3 **A. A young lady. She was stating were they gonna meet up**  
 4 **that night.**  
 5 Q. What's her name?  
 6 **A. It's emojis. It's not a name.**  
 7 Q. Did you look through his Instagram on the phone?  
 8 **A. Yes, I have.**  
 9 Q. What's his Instagram?  
 10 **A. 313.longliveMike.**  
 11 Q. 313.longliveMike?  
 12 **A. Yes.**  
 13 Q. When was the setup?  
 14 **A. I guess when he set it up. I don't know.**  
 15 Q. So he set that up prior to his death? That's not what  
 16 you set up?  
 17 **A. No.**  
 18 Q. Okay. Did you see any Instagram messages indicating  
 19 anything about the races, who he might have been with?  
 20 **A. No.**  
 21 Q. Did he have a Facebook?  
 22 **A. Yes.**  
 23 Q. What's his Facebook?  
 24 **A. BandUp Mike.**  
 25 Q. Is that all one word?

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1 **A. The BandUp is, and Mike is separate.**  
 2 Q. Okay. And that's something that he set up, not you?  
 3 **A. Yes.**  
 4 Q. Okay. Do you know if he had Twitter?  
 5 **A. No.**  
 6 Q. No, he didn't have a Twitter or --  
 7 **A. No, I don't know.**  
 8 Q. Okay. And you still have the phone?  
 9 **A. Yes.**  
 10 Q. Have you erased any of the messages or anything like  
 11 that?  
 12 **A. No.**  
 13 Q. Have you erased any of the text messages?  
 14 **A. No.**  
 15 Q. Have you erased any of the call logs?  
 16 **A. No.**  
 17 Q. Have you erased any of the Instagram posts or  
 18 Instagram messages or --  
 19 **A. No.**  
 20 Q. -- any of the Facebook messages?  
 21 **A. No.**  
 22 Q. Okay. So since the last time you spoke with Sanchez  
 23 and Molly, have you come to have any understanding or  
 24 knowledge about who the other boys or gentlemen were  
 25 in the car?

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1 **A. No.**  
 2 Q. Who is Devin Ramsey?  
 3 **A. No.**  
 4 Q. Did you ask -- do you know -- who does Mike  
 5 typically -- does he have a normal group of friends  
 6 that you know of?  
 7 **A. Yes.**  
 8 Q. Who are his normal group of friends?  
 9 **A. Ty'Juane Morris, Mari -- I can't think of his last**  
 10 **name, V. That's about it. That's the only little**  
 11 **group that he's always in.**  
 12 Q. Okay. So did you ask -- you asked -- you stated that  
 13 you didn't ask Ty'Juane how he knew about this, you  
 14 said, on that night when he showed up at your door.  
 15 Since then, have you asked Ty'Juane how he found out  
 16 about Mike?  
 17 **A. What did he say? He said that someone called him**  
 18 **about it, but he was asleep; so. . .**  
 19 Q. What about Mari? Did you ask Mari anything about --  
 20 **A. I believe it was Mari that called Ty'Juane, if I'm not**  
 21 **mistaken. I might be mistaken, though, but. . .**  
 22 Q. Have you spoken to Mari about it, about how he --  
 23 about whether he knew?  
 24 **A. Did I asking Mari? I don't even think I ever asked**  
 25 **Mari.**

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1 Q. Okay. So V -- is V -- all these are boys?  
 2 **A. Yeah.**  
 3 Q. Or men, I should say. Your son was 19; right?  
 4 **A. Yes.**  
 5 Q. Okay. And at least Ty'Juane and Mari are also --  
 6 **A. Yes.**  
 7 Q. Okay. Same kind of age. Okay. And so V -- did you  
 8 ask V if he knew how Michael got to the race or who he  
 9 may have been with?  
 10 **A. I did, and they don't -- they don't know the boys**  
 11 **either.**  
 12 Q. Did you ask -- anybody else you asked?  
 13 **A. I've asked all of them, all of his friends, friends**  
 14 **that I think he associated with.**  
 15 Q. So no one, none of the friend group -- no one gave you  
 16 any information about that, about -- I'm sorry --  
 17 about who he was with or how he got there?  
 18 **A. Right.**  
 19 Q. Okay. I'm sorry. Do you have a phone number -- did I  
 20 ask you if you had a phone number for Ty'Juane?  
 21 **A. Yeah.**  
 22 Q. Can I have that?  
 23 [REDACTED]  
 24 Q. Okay. That was the one. Mari -- do you have a phone  
 25 number for Mari?

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1 **A. No, I don't.**  
 2 Q. What about V?  
 3 **A. Neither one of them. I don't have their phone**  
 4 **numbers.**  
 5 Q. Okay. Do you know Mari's Instagram? Does he have  
 6 Instagram?  
 7 **A. Yes, he does. I believe it's tnlMari.**  
 8 Q. What about V?  
 9 **A. I don't know if V has one.**  
 10 Q. Do you know if V has Facebook?  
 11 **A. No, he doesn't have a Facebook.**  
 12 Q. Twitter?  
 13 **A. No. I don't know about Twitter either.**  
 14 Q. Okay. So I asked you -- well, actually, I sent to  
 15 your attorney some requests for admissions regarding  
 16 any witnesses to the shooting, and the only witnesses  
 17 that -- and that was September, I believe,  
 18 September 18th of 2022, that Mr. Robinson provided  
 19 answers on your behalf. And he stated that the  
 20 witnesses to this incident were a Brooklyn Ostrowski  
 21 and a Jacob Platt or Pratt, I believe. Is that  
 22 correct?  
 23 **A. I guess.**  
 24 Q. Okay. Do you know of any other witnesses other than  
 25 those two individuals?

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1 **A. No.**  
 2 Q. Okay. So did you speak with -- have you spoken --  
 3 what about a Christopher Harris? Have you spoken with  
 4 a Christopher Harris?  
 5 **A. No.**  
 6 Q. No? Anybody on your behalf spoken with Christopher  
 7 Harris? Your husband, friends, any --  
 8 **A. No, not that I know.**  
 9 Q. You have no idea who Christopher Harris is?  
 10 **A. No.**  
 11 Q. Okay. Okay. When I asked you about those two  
 12 witnesses, you kind of scrunched your face up, like  
 13 that wasn't familiar to you. You do know those two  
 14 individuals?  
 15 **A. I know of them now, but I didn't know them, no.**  
 16 Q. Okay. When did you first learn of those two  
 17 individuals?  
 18 **A. Since the case has been going.**  
 19 Q. Since the case has been going, since -- so can you  
 20 give me -- was it last year that you found out about  
 21 them?  
 22 **A. I believe it was the end of 2021.**  
 23 Q. So you're talking November or December?  
 24 **A. Yes. It was cold.**  
 25 Q. Okay. So how did you find -- how did you find out

1 about -- let's talk about the first person -- Brooklyn  
 2 Ostrowski?  
 3 **A. How did I find out about her?**  
 4 Q. Yeah.  
 5 **A. She contacted Michael's cousin.**  
 6 Q. Who is Michael's cousin?  
 7 **A. Kaylee.**  
 8 Q. Kaylee, K-a-y-l-e-e?  
 9 **A. I don't know how you spell her name. Actually, it's**  
 10 **Mykayla, so M-y-k-a-y-l-a, I believe.**  
 11 Q. Okay. So Michael's cousin on Dad's side?  
 12 **A. Dad.**  
 13 Q. Is she an Adams as well?  
 14 **A. Yes.**  
 15 Q. Do you have a phone number for Mykayla?  
 16 **A. No.**  
 17 Q. Do you know her Instagram or --  
 18 **A. I have her Instagram.**  
 19 Q. Okay. Can you provide that for me, please.  
 20 **A. They changed the name. Let me see.**  
 21 (Off the record at 11:00 a.m.)  
 22 (Back on the record at 11:05 a.m.)  
 23 (Officer Jejuan Jetter enters at 11:05  
 24 a.m.)  
 25 MS. OLMSTEAD: Okay. Can you read the last

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1 question back to me, please.  
 2 (The court reporter read back the previous  
 3 question at 11:05 a.m.)  
 4 BY MS. OLMSTEAD:  
 5 Q. Okay. All right. We can move on. So Mykayla --  
 6 Brooklyn contacted Michael's cousin, Mykayla Adams,  
 7 and so then what did Mykayla -- did she tell you  
 8 how -- did Mykayla contact you after that?  
 9 **A. Yes.**  
 10 Q. Okay. How did Mykayla contact you?  
 11 **A. She Instagrammed me.**  
 12 Q. What did she Instagram you?  
 13 **A. She said, "Auntie, this girl was there," and sent me a**  
 14 **screenshot of her Instagram.**  
 15 Q. Okay. And so what happened then? Did you -- did  
 16 Mykayla contact the girl, or did you contact Brooklyn,  
 17 or did Brooklyn contact you?  
 18 **A. I'm not sure if she contacted her, but I didn't**  
 19 **contact her. I gave the information to Mr. Robinson.**  
 20 Q. Okay. So you didn't contact her. You gave the  
 21 Instagram post that Mykayla gave you to Mr. Robinson?  
 22 **A. Right.**  
 23 Q. Okay. I don't know -- did Mr. Robinson, to your  
 24 knowledge -- did he contact her?  
 25 **A. I'm not sure.**

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1 Q. Okay. Did you ever have any conversation with  
2 Brooklyn?  
3 **A. Never.**  
4 Q. Did you ever have any conversation with the other  
5 gentleman, who is listed as a witness, Jacob Platt  
6 [sic]?  
7 **A. No.**  
8 Q. And you have never met either one of these people?  
9 **A. Never.**  
10 Q. Never talked to them on the phone?  
11 **A. Never.**  
12 Q. Never met them at Mr. Robinson's office?  
13 **A. Never.**  
14 Q. Never texted with them?  
15 **A. Never.**  
16 Q. So, Ms. Curtis, are you aware that we deposed Brooklyn  
17 and Jacob, and Brooklyn specifically said that she  
18 reached out -- you reached out to her. Someone from  
19 the family asked for her to reach out to you, and then  
20 there was a two-hour phone conversation in which  
21 she -- you asked her how Michael -- how he died, was  
22 he -- did he seem okay --  
23 **A. I never talked to anybody named Brooklyn, ever.**  
24 Q. Did any of your family members, perhaps, speak --  
25 **A. I said Mykayla might have. I have never talked --**

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1 Q. Other than -- sorry. Other than Mykayla, did --  
2 **A. She's the only person that I knew that knew of a**  
3 **Brooklyn -- or Brooklyn -- other than me, after she**  
4 **told me, was Mykayla. Nobody else talked to Brooklyn.**  
5 Q. So do you have any idea why Brooklyn would say that  
6 she spoke with you and your family and had a two-hour  
7 conversation?  
8 **A. No, I don't.**  
9 Q. And I believe that Brooklyn also testified that she  
10 went to the scene with you -- the scene of the  
11 shooting -- with you, Mr. Robinson, Jacob. That also  
12 would not be true?  
13 **A. I never went to no scene with no Brooklyn.**  
14 Q. Did you go to the scene with anyone?  
15 **A. When I had my son's memorial, yes, I did.**  
16 Q. Okay. So from Brooklyn's deposition, this was listed  
17 as Plaintiff's Exhibit No. 1. We'll just mark it  
18 again as Defense Exhibit, I guess, No. 1. Is this the  
19 message that -- the screenshot that Mykayla shared  
20 with you?  
21 **MARKED BY THE REPORTER:**  
22 **DEFENDANTS' EXHIBIT 1**  
23 **11:10 a.m.**  
24 **A. Yes.**  
25 Q. Okay. Okay. Did -- I guess I can't ask you that.

1 You posted, September 15, 2021, on your Instagram, and  
2 you're -- I'm sorry. Let's clarify. You are  
3 underscore, Mrsbigface, underscore; correct?  
4 **A. Yes.**  
5 Q. Okay. So you posted on September 25, 2021, and  
6 witnesses confirmed he kept looking back to see who  
7 was shooting at him. Who were you referring to?  
8 **MR. ROBINSON: Can I see that?**  
9 **THE WITNESS: I'm referring to --**  
10 **MR. ROBINSON: Wait.**  
11 **MS. OLMSTEAD: She can answer. Can you**  
12 **hand it back, please.**  
13 **BY MS. OLMSTEAD:**  
14 Q. So -- I'm sorry. So who you were you referring to?  
15 **A. I'm referring to what I was sent.**  
16 Q. Okay. So brookmarie@grmintfinance said, "Never said  
17 it wasn't a stolen Charger. LMFAO" -- laughing my  
18 fucking ass off. "I just said that man didn't have a  
19 gun and I'm going to defend that man, as I was feet  
20 away from him and watched shit go down, as it was my  
21 car that he almost smacked. But I'm straight on it.  
22 I continue getting photos wherever I choose."  
23 So within this specific screenshot from  
24 Instagram from Brooklyn, she doesn't say "Witnesses  
25 confirmed he kept looking back"; correct?

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1 **A. Correct.**  
2 Q. So where did you get that information from that you  
3 posted on September 25th -- September 15th of 2021?  
4 **A. It's multiple -- CrimeInTheD. People were all on**  
5 **there. I was screenshoting what people were saying**  
6 **when it happened.**  
7 Q. Okay. Do you have -- so you screenshot them with your  
8 phone?  
9 **A. Yes.**  
10 Q. Do you still have those screenshots?  
11 **A. I don't think I do.**  
12 Q. Okay. So you don't know who those witnesses are if  
13 you don't have the screenshots anymore?  
14 **A. No. I just know whatever their name was on**  
15 **CrimeInTheD.**  
16 Q. Okay. Well, give me that information.  
17 **A. I don't have it anymore.**  
18 Q. Okay. "My son had graze marks on his face from trying  
19 to see who was shooting at him. These young men have  
20 a hard enough time from worrying about people in the  
21 streets to now have to worry about the police killing  
22 them. Detroit Police Department, I want answers."  
23 That's on the same post with the --  
24 **A. Yes.**  
25 Q. "Graze marks," what do you mean "graze marks"?

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1 A. Graze marks from a bullet passing by his face. I  
 2 looked at him.  
 3 Q. Okay. So that's what I asked you about. So when you  
 4 were in the hospital at Henry Ford, you saw what you  
 5 felt were graze marks on his face?  
 6 A. What were graze marks, yes.  
 7 Q. How do you know they were graze marks?  
 8 A. 'Cause I'm pretty sure he didn't burn himself.  
 9 Q. Okay. Did you ask the doctor if those were graze  
 10 marks?  
 11 A. No. I didn't need to.  
 12 Q. Have you seen someone shot before?  
 13 A. Yes.  
 14 Q. Okay. And so you know what a graze mark looks like  
 15 from seeing other people get shot?  
 16 A. Yes.  
 17 Q. Who have you seen get shot?  
 18 MR. ROBINSON: That's not relevant.  
 19 You don't have to answer that.  
 20 BY MS. OLMSTEAD:  
 21 Q. Can you answer. I just --  
 22 MR. ROBINSON: She doesn't have to answer  
 23 that. Ask your next question.  
 24 MS. OLMSTEAD: You're instructing her not  
 25 to answer the question?

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1 MR. ROBINSON: Yes.  
 2 MS. OLMSTEAD: I want to know so I can,  
 3 perhaps, test your level of your competency with  
 4 determining graze marks.  
 5 MR. ROBINSON: Don't answer that question.  
 6 Ask your next question.  
 7 BY MS. OLMSTEAD:  
 8 Q. So you also posted --  
 9 MS. OLMSTEAD: For the record, let the  
 10 record reflect that Mr. Robinson's instructing his  
 11 client not to answer that question, and I'll move on.  
 12 BY MS. OLMSTEAD:  
 13 Q. You also posted what appears to me to be a screenshot  
 14 of a text message, "It's the right thing to do.  
 15 IK" -- which tends to mean "I don't know," I guess --  
 16 "people may think he had that gun, but he didn't. He  
 17 was running away when they shot him, no gun, no  
 18 nothing. He didn't have a gun. When he got out, they  
 19 literally shot him four to six times, and I had to be  
 20 the person he ran into and hear his last words, cry  
 21 for his mom and see the scaredness in his eyes. They  
 22 wrong. He was never a threat, and for a Black cop to  
 23 shoot him -- shoot him, at that, is sick."  
 24 Is this a screenshot of a text message?  
 25 A. Yes.

1 Q. Who is this text message to?  
 2 A. It was sent to Mykayla.  
 3 Q. And who is it from?  
 4 A. I don't know. That's the only part I got.  
 5 Q. Okay. So we know Mykayla talked with -- or screenshot  
 6 and spoke with Brooklyn?  
 7 A. Correct.  
 8 Q. Did Mykayla tell you that this was from Brooklyn?  
 9 A. She didn't. She just sent me that. That's it.  
 10 Q. Okay.  
 11 MS. OLMSTEAD: Let's mark that as  
 12 Defense 2.  
 13 MARKED BY THE REPORTER:  
 14 DEFENDANTS' EXHIBIT 2  
 15 11:18 a.m.  
 16 BY MS. OLMSTEAD:  
 17 Q. So it's my understanding, from your summons from your  
 18 complaint, that you are of the opinion that Michael  
 19 did not have a gun.  
 20 MS. OLMSTEAD: I'm sorry, Mr. Robinson.  
 21 Let the record reflect that there's a question that's  
 22 being posed and you're not supposed to assist your  
 23 witness while -- your client -- while there's a  
 24 question posed. You're just gonna go ahead and keep  
 25 talking to her? Okay. Let the record reflect --

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1 okay.  
 2 BY MS. OLMSTEAD:  
 3 Q. So, again, it's my understanding, from your -- from  
 4 the allegations in your complaint, that you believe  
 5 that Michael did not have a gun. Is that correct?  
 6 A. Yes.  
 7 Q. Okay. What are you basing that on?  
 8 A. That I know he didn't have a gun?  
 9 Q. Yes.  
 10 A. That's my answer.  
 11 Q. You just know?  
 12 A. I know he didn't have no gun.  
 13 Q. But you weren't there --  
 14 A. I know --  
 15 Q. -- correct?  
 16 A. -- that my son didn't have a gun.  
 17 Q. So, again, the last you saw him was about 5:30;  
 18 correct?  
 19 A. Yes, ma'am.  
 20 Q. This incident happened in the wee morning hours of  
 21 August the 9th, so we're talking at least seven hours  
 22 in between, the last time you saw him before the  
 23 shooting; correct?  
 24 A. Yes.  
 25 Q. Okay. And you haven't spoken to any of the guys that



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1 were in the car?  
 2 **A. Right.**  
 3 Q. Don't know who any of those people are; correct?  
 4 **A. Correct.**  
 5 Q. Okay. And you just somehow know that he didn't have a  
 6 gun?  
 7 **A. I know my son didn't have a gun.**  
 8 Q. You know; it's a mother's intuition?  
 9 **A. Yes.**  
 10 Q. Okay. Let me ask you, did Michael have access to  
 11 guns, that you know of?  
 12 **A. Everyone has access to guns.**  
 13 Q. Okay. So if Michael has access to guns, then he could  
 14 have had a gun that night; right?  
 15 **A. No, he did not.**  
 16 MR. ROBINSON: That's an argument. Don't  
 17 have an argument with her.  
 18 BY MS. OLMSTEAD:  
 19 Q. Let's talk about mother's intuition a little bit more.  
 20 So you know that Michael -- as you said, everyone has  
 21 access to a gun. I don't have access to a gun. So  
 22 have you ever seen Michael with a gun?  
 23 **A. Yes.**  
 24 Q. Where were you at? Where was he when he had the gun?  
 25 **A. He's held my gun.**

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1 Q. What kind of gun do you have?  
 2 **A. A .380.**  
 3 Q. Other than that?  
 4 **A. No.**  
 5 Q. Do you know if he owned a gun?  
 6 **A. He did not.**  
 7 Q. You're certain he didn't own a gun?  
 8 **A. I'm certain.**  
 9 Q. Did Michael ever talk to you about guns, interest in  
 10 guns, or anything like that?  
 11 **A. No.**  
 12 Q. So he wasn't generally interested in guns?  
 13 **A. No, not that I know of.**  
 14 Q. Were you aware that he had been arrested several weeks  
 15 prior to this incident for a gun charge?  
 16 **A. Yes, I was aware.**  
 17 Q. So that was another time that he had a gun?  
 18 MR. ROBINSON: Object to the form of the  
 19 question. You said it's "another time."  
 20 **THE WITNESS: I wasn't --**  
 21 BY MS. OLMSTEAD:  
 22 Q. Other than the time he held your gun. So that's  
 23 another --  
 24 **A. Oh. I'm like, "That didn't make no sense," but yes.**  
 25 Q. And when he was with his friends, a group of his

1 friends at that time?  
 2 **A. Yes.**  
 3 Q. Who were those friends?  
 4 **A. It was a video shoot. It was a lot of boys. I don't**  
 5 **know.**  
 6 Q. So there were several guns at that video shoot. Were  
 7 you aware of that?  
 8 **A. Yes.**  
 9 Q. How do you know it was a video shoot?  
 10 **A. Because I was told it was a video shoot.**  
 11 Q. Who told you that?  
 12 **A. Michael.**  
 13 Q. How did he -- so he was processed, or he was arrested,  
 14 taken to the DDC. Did you get him, bail him out, or  
 15 did you get him out of jail?  
 16 **A. No. He was released with no charges.**  
 17 Q. So this is -- did he tell you -- he didn't tell you  
 18 who was starring in the video, the music video?  
 19 **A. It was Richtown Butter's video.**  
 20 Q. Does Richtown have a name? Or, obviously, has a name.  
 21 Do you know his real name?  
 22 **A. No.**  
 23 Q. Did he tell you where he got that gun?  
 24 **A. I believe it was one of the gentlemen's there.**  
 25 Q. When you said that he was released with no charges,

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1 what do you mean by that?  
 2 **A. They didn't charge him with anything.**  
 3 Q. How do you know that?  
 4 **A. 'Cause I know. They released him after two days.**  
 5 Q. Do you know if he was booked?  
 6 **A. Everyone's booked when you go in.**  
 7 Q. Do you know if he saw a judge?  
 8 **A. No, he did not.**  
 9 Q. Okay. They released him after two days?  
 10 **A. Yes.**  
 11 Q. Did they give him back the gun?  
 12 **A. No.**  
 13 Q. Did he tell you why he -- scratch that question.  
 14 Never mind.  
 15 I don't have this one printed out, but I  
 16 would like to mark it.  
 17 MS. OLMSTEAD: Which one are we on? We're  
 18 on 3? I'll send it to you after the fact, but I'll  
 19 have Ms. Curtis take a look at this. It's a  
 20 photograph.  
 21 MARKED BY THE REPORTER:  
 22 DEFENDANTS' EXHIBIT 3  
 23 11:27 a.m.  
 24 BY MS. OLMSTEAD:  
 25 Q. Is this your son, Michael?

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1 A. Yes, that's my son.

2 Q. What does Michael have in his hands?

3 A. A gun.

4 Q. Two guns?

5 A. Yes.

6 Q. Okay. And have you ever seen him -- have you seen him  
7 with these guns before?

8 A. Never.

9 Q. No? Have you ever seen this picture before?

10 A. I think I did before on his page.

11 Q. Okay. So that's another. Was that from the video  
12 shoot or from something else?

13 A. Those are Richtown Butter's guns.

14 MS. OLMSTEAD: Again, I don't have a copy  
15 of this one either, but I would like to mark it as --

16 I guess we're on 5 now -- 4. Sorry.

17 MARKED BY THE REPORTER:

18 DEFENDANTS' EXHIBIT 4

19 11:29 a.m.

20 BY MS. OLMSTEAD:

21 Q. This is another photo of your son. Yes? That's your  
22 son?

23 A. Uh-huh.

24 Q. And what does he have in his hands in this picture?

25 A. Guns.

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1 Q. Guns? One, two -- three guns?

2 A. Uh-huh.

3 Q. Who is he in the picture with?

4 A. With Ty'Juane.

5 Q. That's Ty'Juane?

6 A. Yes.

7 Q. Ty'Juane goes by MTB Pocc?

8 A. Uh-huh.

9 Q. Okay.

10 A. I mean yes. Sorry.

11 MS. OLMSTEAD: Again, I'll send you a copy  
12 of it.

13 BY MS. OLMSTEAD:

14 Q. Do you have any idea what -- MTB Pocc has a comment --  
15 on -- I shouldn't say comment. The caption is "We  
16 then sold it all. Now it's cold as December," and  
17 there's a little snowflake and a little snowman.

18 A. One of his songs.

19 Q. That's one of whose songs?

20 A. MTB Pocc's.

21 Q. So is MTB Pocc the same person as Richtown Butters?

22 A. No.

23 Q. Those are two different people?

24 A. Yes.

25 Q. Okay. So MTB Pocc stands for?

1 A. I don't know.

2 Q. So was Michael a rapper as well?

3 A. Yes.

4 Q. Okay. What's Michael's -- what was Michael's stage  
5 name or his rap name?

6 A. BandUp Mike.

7 Q. And so in their rap careers, are the guns prevalent in  
8 their --

9 A. They're props.

10 Q. Oh, props. A gun that -- so the Brooklyn person that  
11 was listed that testified and claimed that she had met  
12 you, you deny all that -- or, I'm sorry -- claims that  
13 she spoke to you for two hours and all that, she also  
14 testified that Mike got out of the car and went back  
15 to the car, and she indicated that he -- she was --  
16 she indicated that he may have been trying to go to  
17 get his phone because -- so he wouldn't be implicated  
18 in the car crash and all that.

19 MR. ROBINSON: She cannot testify to what  
20 Brooklyn said or didn't say.

21 MS. OLMSTEAD: Hold on. I've got a  
22 question there.

23 BY MS. OLMSTEAD:

24 Q. But since you testified that Michael did not have his  
25 phone with him, then he couldn't have been going back

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1 to get that phone; correct?

2 MR. ROBINSON: Object to the form of the  
3 question. Compound. And how would she know?

4 THE WITNESS: I didn't understand the  
5 question. That was real long.

6 MS. OLMSTEAD: Fair enough.

7 BY MS. OLMSTEAD:

8 Q. So if Michael -- do we agree that Michael got out of  
9 the car, started to go to the back -- let me back --

10 MR. ROBINSON: You can't -- she wasn't  
11 there.

12 BY MS. OLMSTEAD:

13 Q. Have you seen the video of this incident?

14 A. Yes.

15 Q. Okay. And are you aware that Michael got out of the  
16 car in the video -- got out of the car, went to the  
17 back, and then returned to the car?

18 A. I don't know exactly what I saw in the video, to be  
19 honest. It's blurry.

20 Q. Okay.

21 MS. OLMSTEAD: Let's mark this as  
22 Defense 6. No? Am I. . .

23 THE COURT REPORTER: We're on 5.

24 MR. ROBINSON: Let me see it before you ask  
25 any questions.

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1 MS. OLMSTEAD: I don't have to let you see  
 2 it before I ask the question.  
 3 Let me ask the question; then I'll hand to  
 4 it your attorney. I'm going to read it, actually,  
 5 again. We have established that you were  
 6 \_mrsbigface\_. You posted March 22nd, "I sit sometimes  
 7 and just wonder, what if you didn't get over that  
 8 first hangover that day? What if you never found your  
 9 phone? What if I just found something for you to do?  
 10 What if you just stayed home being lame with me. What  
 11 if you never went back to that car?" So --  
 12 MR. ROBINSON: Let me see it.  
 13 MARKED BY THE REPORTER:  
 14 DEFENDANTS' EXHIBIT 5  
 15 11:35 a.m.  
 16 MS. OLMSTEAD: I read that portion.  
 17 BY MS. OLMSTEAD:  
 18 Q. So it sounds -- so you -- this is your post; correct?  
 19 **A. Yes.**  
 20 Q. Okay. So it sounds like -- "What if you never went  
 21 back to that car?" Sounds like you knew that he went  
 22 back to the car?  
 23 **A. I heard he went back to the car.**  
 24 Q. Okay. So that's all I'm asking you is that you're  
 25 aware he went back to the car.

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1 **A. Yes.**  
 2 Q. Okay. And -- but if he went back to the car -- if he  
 3 didn't have that phone with him, then he couldn't have  
 4 been going back to the car for a phone; right?  
 5 **A. He went back to the car for a phone.**  
 6 Q. Whose phone?  
 7 **A. His friend's phone.**  
 8 Q. Oh, he went back to get his friend's phone. Okay.  
 9 How do you know that?  
 10 **A. Because the friend didn't have their phone and he had**  
 11 **their phone, so that's the only thing that they can**  
 12 **guess he went back for.**  
 13 Q. You don't think that -- that -- so -- I'm sorry. Now,  
 14 he had a friend's phone?  
 15 **A. He did have a friend's phone.**  
 16 Q. Okay. So how do you know that?  
 17 **A. Because the friend told me that he had his phone.**  
 18 Q. What friend told you that?  
 19 **A. I can't think of his name. I only know him by his**  
 20 **nickname.**  
 21 Q. So he went back to get the friend's phone that was in  
 22 the -- one of the friend's that was in that car?  
 23 **A. No.**  
 24 Q. Oh, okay. So he just had some random friend's phone?  
 25 **A. Yes.**

1 Q. Whose name you don't remember?  
 2 **A. I said I know his nickname.**  
 3 Q. What's his nickname?  
 4 **A. Kezzo.**  
 5 Q. K-e-z-z-o?  
 6 **A. I guess.**  
 7 Q. Where does he live at?  
 8 **A. He doesn't live here.**  
 9 Q. Do you have a phone number for him?  
 10 **A. No.**  
 11 Q. So when did Kezzo tell you that he had -- that Michael  
 12 had his phone?  
 13 **A. I believe it was at Michael's funeral.**  
 14 Q. Did he -- did Kezzo tell you how Michael came into  
 15 possession of his phone?  
 16 **A. No.**  
 17 Q. What did you mean by "What if you never found your  
 18 phone?" What were you talking about?  
 19 **A. He had lost his phone night before.**  
 20 Q. But you already testified that you looked at the  
 21 phone; correct?  
 22 **A. Yes.**  
 23 Q. And there was messages on the Instagram that indicated  
 24 where he was going, who he was going with or anything  
 25 like that; right?

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1 **A. Right.**  
 2 Q. And there were no text messages indicating, you know,  
 3 the meet-up, who he was going with, or anything like  
 4 that?  
 5 **A. Right.**  
 6 Q. So what difference would it make if he found his phone  
 7 or not?  
 8 **A. 'Cause, obviously, he was in contact with someone to**  
 9 **go to the races.**  
 10 Q. But it wasn't -- there was nothing on the phone.  
 11 That's what you testified.  
 12 **A. Yes, that is what I testified.**  
 13 Q. So, again, how would it make any difference? That's  
 14 not how he got into contact --  
 15 **A. It might not.**  
 16 MR. ROBINSON: That's not relevant.  
 17 MS. OLMSTEAD: It's very relevant.  
 18 BY MS. OLMSTEAD:  
 19 Q. Now, what is this about "you didn't get over that  
 20 first hangover that day"? What was he hungover from?  
 21 **A. They had a block party.**  
 22 Q. Okay.  
 23 **A. His first time drinking.**  
 24 Q. Oh, his first time drinking. How do you know it was  
 25 his first time drinking?



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1 A. 'Cause he's my son.  
 2 Q. What was he drinking?  
 3 A. Tequila.  
 4 Q. Were you drinking with him?  
 5 A. No.  
 6 Q. Okay. And so he was 19 when he died, and so he wasn't  
 7 actually old enough to drink; correct?  
 8 A. Correct.  
 9 Q. Do you know how he got the tequila?  
 10 A. It was a block party.  
 11 Q. So they were just giving out -- at this block party,  
 12 they're just giving out alcohol to --  
 13 A. I guess so.  
 14 Q. -- to underage people?  
 15 A. I guess so.  
 16 Q. Were you upset about that?  
 17 MR. ROBINSON: That's not relevant.  
 18 You don't have to answer that.  
 19 BY MS. OLMSTEAD:  
 20 Q. So this was the first time drinking and, again, you're  
 21 his mom; that's one of those mother's intuition  
 22 things, like he didn't have the gun -- have a gun that  
 23 night? Is that the same thing?  
 24 A. Is that a question?  
 25 Q. Is it the mother's intuition with -- your knowledge

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1 that he's never drunk before? Same thing as with the  
 2 fact that he didn't have the gun?  
 3 A. No, that's not an intuition.  
 4 Q. So what is it? How do you know?  
 5 A. I know he didn't drink.  
 6 Q. Okay. Did he -- so he didn't drink. He also didn't  
 7 do drugs or anything like that, I presume; correct?  
 8 A. I didn't hear the question.  
 9 Q. So he didn't drink. He also didn't do any drugs or  
 10 anything like that; correct?  
 11 A. Not to my knowledge.  
 12 MS. OLMSTEAD: Seven?  
 13 THE COURT REPORTER: Six.  
 14 MS. OLMSTEAD: I don't have a printout of  
 15 this one, but I will send it to you. Mark it as  
 16 No. 7 [sic].  
 17 MARKED BY THE REPORTER:  
 18 DEFENDANTS' EXHIBIT 6  
 19 11:44 a.m.  
 20 BY MS. OLMSTEAD:  
 21 Q. Okay. I'm going to show you a picture from MTB Pocc's  
 22 page again, and is that Mike?  
 23 A. Yes.  
 24 Q. And what's he holding in his hand?  
 25 A. A can.

1 Q. You don't know what that can is, do you?  
 2 A. No.  
 3 Q. Would you believe me if I told you that's drug  
 4 paraphernalia for whippits; you huff with that?  
 5 A. Okay.  
 6 Q. Have you ever -- okay. So did you know if Mike was  
 7 using whippits?  
 8 A. No, I didn't.  
 9 Q. Okay.  
 10 MR. ROBINSON: That doesn't picture -- I  
 11 object to the characterization of -- it's a picture.  
 12 BY MS. OLMSTEAD:  
 13 Q. Did you have an opportunity to -- and I can't find  
 14 this picture, but I also have another picture of Mike.  
 15 He's in the car, and he has two bottles of  
 16 prescription codeine. And you can see here the other  
 17 boys in this video, they're also holding up the  
 18 codeine.  
 19 MR. ROBINSON: That's not a question.  
 20 BY MS. OLMSTEAD:  
 21 Q. Did you know that he was -- to your knowledge, was he  
 22 using, as they call it, sizzurp syrup --  
 23 A. No.  
 24 Q. -- with codeine, prescription cough medicine?  
 25 MR. ROBINSON: You're assuming he was using

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1 it. You asked the question as though he was using it.  
 2 You don't have any foundation for it.  
 3 BY MS. OLMSTEAD:  
 4 Q. Did you have an opportunity to look at the toxicology  
 5 report in this case?  
 6 A. No.  
 7 Q. Would it surprise you if I told you that he had  
 8 codeine in his system, which is consistent with the  
 9 prescription cough medicine?  
 10 A. You said would it surprise me?  
 11 Q. Yes.  
 12 A. Yes.  
 13 Q. Okay. It certainly wouldn't surprise you that he had  
 14 marijuana in his system.  
 15 A. No.  
 16 Q. Okay. So you know that he does marijuana?  
 17 A. Yes.  
 18 Q. On reviewing some of your Instagram posts, I have  
 19 noticed that there seems to be -- were people after --  
 20 based on your post, I kind of got -- a lot of your  
 21 posts -- I got the impression that after Michael's  
 22 death, people -- some of your friends and family  
 23 members -- were criticizing Michael and criticizing  
 24 you. Is that true or --  
 25 MR. ROBINSON: Is that a question?

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1 MS. OLMSTEAD: Yeah, that's a question.

2 BY MS. OLMSTEAD:

3 Q. Criticizing you, saying he was a bad kid, that sort of  
4 thing?

5 A. No.

6 Q. No?

7 A. No.

8 Q. Okay. Let me ask you, what's -- what does this mean?

9 "People be mad, but this nigga was that nigga to me,  
10 wrong or right, good or bad. I know this nigga was

11 gonna ride. Real shit. If I placed a call to this

12 nigga, he coming. I could be, like, I ain't feeling

13 up being here. He pulling up like, Come on, Ma. It's

14 up. Turn up. I miss you, son. Life ain't the same

15 without you here." What were you talking about in

16 this post?

17 A. It's self-explanatory.

18 Q. Okay. What about this one? "I just wanted to see my  
19 baby win. All that hate people had for him, all the

20 doubts people had about him. He was more solid than a

21 lot of these niggas. Even if he felt some kind of

22 way, he always still loved who he knew deep down loved

23 him. He was the definition of pull-up game strong,

24 most 100 nigga I knew." What did you mean by this,

25 "all the hate people had for him"? Who had hate for

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1 him?

2 A. His biological father's family.

3 Q. So Christopher -- I'm sorry -- Michael Adams, Sr.'s  
4 family?

5 A. Yeah, Jr. He's a junior.

6 Q. Okay. How about this one? So why did -- how did you  
7 know that Michael, Sr.'s family hated him or had hate  
8 for him?

9 A. They disliked him.

10 Q. Did they tell you why?

11 A. 'Cause he was a very outspoken child.

12 Q. Outspoken about what? Did they explain to you --

13 A. About his father not being a good parent.

14 Q. "I'm forever fucked up. People don't know my son gave  
15 me a heart to keep pushing. He literally was my life  
16 coach. Ain't no guide to this parenting shit.

17 Nothing was perfect, but he always wanted to see me  
18 win and vice versa. We went hard for each other.

19 That can't be replaced. People hated us for it. It

20 was so many that told me he wouldn't make it. IG" --

21 I guess -- "they going to their wish." Who -- who are

22 those people that hated you -- hated "us," meaning you

23 and Michael, for your going hard for each other?

24 A. For our bond?

25 Q. Yes.

1 A. His father's family.

2 Q. His father's family. Then you have another one of

3 these. "The fuckery. . . What does how many

4 children, or baby's daddies" -- B-Ds, excuse me -- "I

5 have matter with my son being murdered. Why does him

6 being in a car of another person matter? I don't care

7 if that car was stolen. He was a person. He was a

8 passenger." So how did you know -- who were you

9 talking about, or what -- why did you post this?

10 A. I don't recall.

11 Q. So you also posted another, talking about you're on a

12 lot of these sites and reading the comments. Do you

13 know what sites you were on and reading comments?

14 A. CrimeInTheD, whatever the other one is in Detroit.

15 Q. So the CrimeInTheD -- so were these people that you --

16 that knew you --

17 A. No.

18 Q. -- that were asking about your kids and baby daddies  
19 and all that?

20 A. No.

21 Q. Okay. "I've sat and read so many comments from these

22 different sites from people who weren't there and who

23 don't know him. Even the officers, fellow officers

24 putting lies out to change what was and what is the

25 truth. The chief and the news put out lies, and now I

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1 have to watch my baby attacked, criticized, bashed for  
2 false statements, faked evidence, and planted guns."

3 What was the -- what were the -- what was the fake

4 evidence that you were referring to in this one?

5 A. That gun.

6 Q. Oh, that gun?

7 A. Yes.

8 Q. It was a fake gun?

9 A. It wasn't his gun.

10 Q. It wasn't his gun, and you know that --

11 A. I know that wasn't his gun.

12 Q. And you know that because -- even though he's got

13 numerous pictures of him with guns?

14 A. I don't care how many pictures there is. I know  
15 that's not his gun.

16 Q. Okay. His friends have guns. He's a rapper.

17 A. That's not his gun.

18 Q. Not his gun. And according to Brooklyn, someone else  
19 in the car had that gun.

20 A. I don't know what, according to Brooklyn.

21 Q. That's how she testified. Would you -- now we know

22 Brooklyn has said a lot of things that weren't true,

23 based on your testimony; correct?

24 A. If it was dealing with me, yes.

25 Q. Okay. So you still think -- still think that was a

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1 planted gun, or you think Brooklyn -- because --

2 **A. Yes, I believe it was planted.**

3 Q. What makes you believe that?

4 **A. 'Cause it wasn't his gun, so it came from somewhere.**

5 Q. Do you think one of the boys in the car planted a gun?

6 MR. ROBINSON: She doesn't have to answer

7 that. It's not relevant.

8 MS. OLMSTEAD: You have a very narrow

9 interpretation of relevancy for purposes of discovery.

10 MR. ROBINSON: Just ask your next question.

11 MS. OLMSTEAD: Very narrow, considering

12 that it's broad. Discovery is broad in state and

13 federal court, Mr. Robinson, but we'll let the record

14 reflect again that you're instructing your witness,

15 again, not to answer the question.

16 MR. ROBINSON: Ask your next question.

17 BY MS. OLMSTEAD:

18 Q. What about this one? You posted this one May 28th of

19 2022, I believe. "I've got a lot of family, but

20 strangers have become more like family these days.

21 And it's no shot at my "family" -- in quotes --

22 "because those that are solid know who they are. It's

23 taking this situation" -- "It's taking this situation

24 WTH you, son, to see what's what. The fight I'm

25 having, the silence that's killing me, the tiptoe

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1 that's rattling my brain.

2 "People say family over everything, but

3 what does that shit really mean? To me, that could be

4 the little nigga at the liquor store because he might

5 do or help me more than somebody that came out the

6 same cooch. I used to be the same that said, 'Family

7 is family. We stick together no matter what,' but

8 now, TBH, I'm sticking to who is, in my eyes, family.

9 Blood ain't never made nobody solid. That shit just

10 what it is. I miss you, son?"

11 So in this post you're talking about

12 family. Are you talking about your family, or, again,

13 we're still talking about just his?

14 **A. Talking about family, my family.**

15 Q. Your family. So some of your family members have,

16 since this incident, not been supportive? Is that

17 what you're saying in that post?

18 **A. I'm saying my family is not supportive, period. This**

19 **situation should have made them supportive. That's**

20 **what I'm saying.**

21 Q. Okay. They're not supportive at all. What does

22 support look like to you?

23 MR. ROBINSON: I don't understand the

24 question.

25

1 BY MS. OLMSTEAD:

2 Q. What did you want your family members to do that they

3 didn't do that prompted you to post this?

4 MR. ROBINSON: How is this relevant?

5 Seriously. How is it relevant?

6 MS. OLMSTEAD: Do you have a form and

7 foundation objection, as you taught me?

8 MR. ROBINSON: Yeah, and you can't help

9 yourself; so. . .

10 BY MS. OLMSTEAD:

11 Q. So, again, you can answer the question. What prompted

12 you after this to -- what did they not do that you

13 wanted them to do to be supportive?

14 **A. It's not in -- generally what I wanted them to do.**

15 MARKED BY THE REPORTER:

16 DEFENDANTS' EXHIBIT 7

17 12:02 p.m.

18 Q. "I cried the day I turned you in 'cause I thought it

19 was the hardest moment of my life, but the day you

20 came home and saw everything I was trying to get you

21 to see, everything was going so well." What were you

22 talking about in this post?

23 MARKED BY THE REPORTER:

24 DEFENDANTS' EXHIBIT 8

25 12:02 p.m.

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1 **A. Him going to juvenile.**

2 Q. Okay. And when did he come home from that?

3 **A. Like --**

4 Q. What year? How old was he?

5 **A. He was 17.**

6 MARKED BY THE REPORTER:

7 DEFENDANTS' EXHIBIT 9

8 12:03 p.m.

9 Q. So ten weeks ago you posted this: "Fact: Never

10 announce who they were as police officers supposed to.

11 Fact: Was not the driver. Fact: My son had 800 ml

12 of blood in his chest. Fact: The gun found was

13 200 feet away from Mikey. Fact: No DNA on gun.

14 Fact: You can't yell 'drop something' that don't got

15 his fingerprints. Fact: Shot four times in back."

16 Let's just focus on the "Fact: No DNA on gun." How

17 do you know that?

18 **A. At his protest, I heard Mr. Robinson say it.**

19 Q. Okay. "You can't drop something that don't got his

20 fingerprints." What does that mean?

21 **A. The gun didn't have his fingerprints on it.**

22 Q. Have you ever had an opportunity to review the

23 forensics for the gun?

24 **A. No.**

25 Q. That's an important fact to you that leads your

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1 mother's intuition to believe that he didn't have that  
2 gun?

3 **A. The DNA not being on the gun? Yes.**

4 Q. Okay. So this is the laboratory report from State of  
5 Michigan Department of State Police Forensic Science  
6 Division in regards to the gun. So what the  
7 interpretations say is "The DNA profile obtained from  
8 the Taurus firearm swab is not suitable for further  
9 interpretation and analysis due to its complexity and  
10 number of potential contributors; therefore, no  
11 comparison can be made to DNA reference samples."  
12 Now, the reference samples were Michael Adams, Eugene  
13 Fielder, and Jejuan Jetter. They all have reference  
14 samples for them. So do you understand what that  
15 means?

16 **A. I'm guessing they took samples of their fingerprints.**

17 Q. It's buccal swab. Or, actually it's a blood sample  
18 from your son. But what the forensics found was that  
19 it was not suitable for further interpretation and  
20 analysis due to complexity and number of potential  
21 contributors, so they simply could not do the  
22 comparison.

23 MR. ROBINSON: You don't have to answer any  
24 question having anything to do with that. Certainly  
25 not. That's not your -- you're not an expert.

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1 Next question.

2 BY MS. OLMSTEAD:

3 Q. Did anybody ever tell you --

4 MR. ROBINSON: Next question.

5 BY MS. OLMSTEAD:

6 Q. Did anyone ever tell you that?

7 MR. ROBINSON: Next question.

8 BY MS. OLMSTEAD:

9 Q. Has that -- the fact that it's not -- that they  
10 don't -- the fact that he doesn't -- that there's  
11 no -- necessarily the DNA, it's just that they  
12 couldn't get the DNA sample --

13 MR. ROBINSON: Next question.

14 BY MS. OLMSTEAD:

15 Q. -- because there was too many people touching the gun?

16 MR. ROBINSON: Next question.

17 BY MS. OLMSTEAD:

18 Q. Did anyone tell you that?

19 MR. ROBINSON: No. Next question.

20 MS. OLMSTEAD: You're answering for her?

21 MR. ROBINSON: Uh-huh.

22 MS. OLMSTEAD: Okay. And I would say it's  
23 kind of the same thing for fingerprints. Too many.  
24 Not a good sample.  
25

1 BY MS. OLMSTEAD:

2 Q. Did anybody tell you that? Were you under the  
3 understanding that there were fingerprint and DNA  
4 analysis done and your son was excluded? Were you  
5 under that impression? Maybe I should ask it like  
6 that.

7 MR. ROBINSON: You're --

8 I don't know what she's talking about, and  
9 you probably don't know what she's talking about  
10 either.

11 BY MS. OLMSTEAD:

12 Q. Well, you posted about this. You said, "You can't  
13 yell 'drop something' that don't got his  
14 fingerprints," which would indicate that you're saying  
15 he wasn't touching it?

16 **A. I told you that when I was at the protest, when he did  
17 the conference, the news conference, that I heard what  
18 he said.**

19 Q. Okay.

20 **A. That's what I just said.**

21 Q. So he's giving you incorrect information or incomplete  
22 information.

23 **A. It's possible.**

24 Q. "No DNA on gun" -- there was DNA on gun, too much DNA.

25 **A. It's not telling me it wasn't his either.**

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1 Q. Too much to do --

2 **A. It wasn't telling me that it wasn't his either.**

3 MR. ROBINSON: You're arguing. You don't  
4 have to argue with her.

5 MS. OLMSTEAD: Okay.

6 BY MS. OLMSTEAD:

7 Q. You also say several times within your post -- and I'm  
8 not gonna drag it out and pull it all out -- "Shot  
9 four times in back." That's not true either, is it?

10 **A. Yes, it is.**

11 Q. Oh, it is? You posted -- Dr. Spitz's ME exam, he did  
12 an autopsy; correct?

13 **A. Correct.**

14 Q. And you requested that autopsy, or did Mr. Robinson?

15 MR. ROBINSON: That's --

16 No, you don't have to answer that question.

17 BY MS. OLMSTEAD:

18 Q. Did you request the autopsy?

19 MR. ROBINSON: You do not have to answer  
20 that question.

21 Ask another question.

22 MS. OLMSTEAD: Oh, wow, there's a lot of  
23 questions that you don't want answered from relevancy.  
24 Those questions go to the heart of --

25 MR. ROBINSON: Well, 'cause they're stupid.



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1 MS. OLMSTEAD: Aren't you -- now my  
2 questions are stupid. Anyway. . .  
3 MS. OLMSTEAD: Are you not using Dr. Spitz  
4 as an expert in your case?  
5 MR. ROBINSON: Ask the next question.  
6 MS. OLMSTEAD: So we're gonna say that  
7 Dr. Spitz's report is not relevant?  
8 MR. ROBINSON: Ask the next question.  
9 BY MS. OLMSTEAD:  
10 Q. If Dr. Spitz's and every -- there's three medical --  
11 there's three medical examiners that have reviewed  
12 this case. Are you aware of that?  
13 **A. No.**  
14 Q. Okay. So there's Wayne County Medical Examiner,  
15 there's Dr. Spitz, and there is Dr. Dragovic for the  
16 City of Detroit. Okay? Do you have any reason to  
17 disbelieve that?  
18 **A. About how many people -- no.**  
19 Q. Okay. So all three of them say that there was a shot  
20 in the forearm, entrance in the front, exit through  
21 the back.  
22 MR. ROBINSON: She has never seen the  
23 report.  
24 MS. OLMSTEAD: She posted it on her  
25 Instagram.

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1 MR. ROBINSON: Okay. So what? She hasn't  
2 seen the report. She doesn't have to answer these  
3 questions.  
4 **THE WITNESS: What's the question? I don't**  
5 **know.**  
6 MS. OLMSTEAD:  
7 Q. So you have been led -- you have several posts, and  
8 you are talking about the injustice of this case, and  
9 a big part of it is the four shots in the back. You  
10 even say here, "Justified shooting would have my baby  
11 shot in the chest." So what do you mean by that? In  
12 the front?  
13 **A. He would have been facing him when he shot him.**  
14 Q. So if he was shot in the arm, in the forearm, he would  
15 have been facing him -- correct? -- in order to be  
16 shot in -- an entrance wound from the front; correct?  
17 (Mr. Robinson and the witness get up to  
18 leave the room at 12:12 p.m.)  
19 MS. OLMSTEAD: I mean, a question's  
20 pending. It's a legitimate question, Mr. Robinson.  
21 That's, like, the number one thing you can't do. You  
22 tried to call me out -- you literally tried to call me  
23 out for taking my client out after a question was  
24 answered, but you're gonna take her out during a  
25 central question?

1 (Off the record at 12:12 p.m.)  
2 (Back on the record at 12:17 p.m.)  
3 BY MS. OLMSTEAD:  
4 Q. Okay. So you had an opportunity to go out and speak  
5 with Mr. Robinson. Can you answer the question now?  
6 **THE WITNESS: I don't even remember the**  
7 **question.**  
8 MS. OLMSTEAD: Can you read it back?  
9 (The court reporter read back the previous  
10 question at 12:19 p.m.)  
11 **THE WITNESS: I don't know.**  
12 BY MS. OLMSTEAD:  
13 Q. So this is a post from January 14th. I'm not sure of  
14 the year. Where did you get this photo from?  
15 **A. I don't remember.**  
16 Q. Okay. You also have an Instagram -- not an  
17 Instagram -- I believe it's a Facebook, and you have  
18 that photo again. Do you still have the photo?  
19 **A. I believe I do.**  
20 Q. Okay. Sorry about the time on that. So on your  
21 Justice4Mikey Facebook, is that yours? It's you --  
22 are you the owner of this site on Facebook?  
23 **A. Yes.**  
24 Q. Okay. So you have here a -- who is -- let me ask you  
25 this: Who is Lamond James? Lamond, L-a-m-o-n-d.

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1 James, J-a-m-e-s.  
2 **A. I don't know.**  
3 Q. Okay. You don't know. How did you come about this --  
4 how did you get this video? You should know the video  
5 I'm talking about 'cause you put this on your site;  
6 correct?  
7 **A. It was sent to me.**  
8 Q. By whom?  
9 **A. By that person.**  
10 Q. By Lamond? Okay. So now you know who Lamond is?  
11 **A. No, I don't know who he is. He sent it to me.**  
12 Q. How did he send it to you?  
13 **A. He sent it through, I believe, Facebook.**  
14 Q. When did he send it to you?  
15 **A. Last year.**  
16 Q. Okay. Was it before or after you spoke with  
17 Lieutenant Sanchez of the MSP?  
18 **A. After.**  
19 Q. After? Okay. Did you forward this to Lieutenant  
20 Sanchez?  
21 **A. No.**  
22 Q. No? But you testified that if you found something  
23 that might help you identify those people, that you  
24 would let him know or that --  
25 **A. Sanchez hasn't answered the phone to me since I've**

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**1 talked to him.**

2 Q. Oh, so you have called him?

**3 A. Yes.**

4 Q. Okay. One second.

5 (Counsel speaks quietly with Officer

6 Jetter.)

7 Do you still have this video?

**8 A. Yes.**

9 Q. Okay. Is there more to this video than this?

**10 A. That's it.**

11 Q. That's it? I'm going to show you -- and, again, this

12 is also on your Facebook page. This is the BandUp

13 Mike X MTB Manzy - Proof official music video. Can

14 you just -- if I show you the gentlemen in this, can

15 you identify these young men for me?

**16 A. In the video?**

17 Q. Yeah. Okay.

18 (Video plays at 12:26 p.m.)

19 Let's start with that gentleman. Who is

20 that?

21 MR. ROBINSON: Let me see it.

22 MS. OLMSTEAD: I mean, come on.

23 MR. ROBINSON: Let me see the thing.

24 MS. OLMSTEAD: Do you know him?

**25 THE WITNESS: Oh, yeah.**

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1 BY MS. OLMSTEAD:

2 Q. So this video starts with Channel 4 -- a clip from the

3 Channel 4 incident in this case; right?

**4 A. Yes.**

5 Q. Okay. Who decided to make this video? Let me start

6 there.

**7 A. I did.**

8 Q. You did? And did you put it together? Did you do the

9 arrangement?

**10 A. No.**

11 Q. No? Okay. So how did you -- you reached out to --

12 who is the first person in the video?

**13 A. That's my husband.**

14 Q. Okay. That's your husband. That's Tremain?

**15 A. Yes.**

16 Q. Okay. And then next we see Mike. Who is this

17 gentleman?

**18 A. I have to see. That's Manzy.**

19 Q. Who is Manzy?

**20 A. He's the gentleman that did the song with Michael.**

21 Q. Well, so Michael wrote this song or --

**22 A. Yes.**

23 Q. This is one of his? Okay. And who is the other

24 gentleman that's sitting besides Manzy?

**25 A. Ty'Juane.**

1 Q. And that's Ty'Juane. This is going pretty quickly.

2 Who is that guy? So -- sorry. Let's go back. So who

3 is the young man with the little dreads or little

4 twists?

**5 A. That's Kezzo.**

6 Q. That's Kezzo? And that's you in the video, too;

7 correct?

**8 A. Yes.**

9 Q. Okay. Who is Pocc that he's talking about?

**10 A. Ty'Juane.**

11 Q. Ty'Juane? Okay.

12 (Video plays.)

13 Is that the same young man or a different

14 one?

**15 A. Can you take the thing off? Can you move the --**

16 Q. I can't move the power here.

**17 A. Yeah. That's Manzy.**

18 Q. And is that you right there?

**19 A. Yes.**

20 Q. Okay. That's Manzy again?

**21 A. Yes.**

22 Q. Who was Kodak?

**23 A. One of their friends.**

24 Q. Okay. They were trying to free him from where?

**25 A. I guess he in jail.**

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1 (Video plays.)

2 Q. Oh, okay. Who is he talking about? Obviously, Mike's

3 not in this video; right?

**4 A. This was done for his birthday.**

5 Q. Okay. So he's talking about Mike, though, in that

6 line?

**7 A. Yes.**

8 Q. What are these signs, the hand signs that they're

9 putting up?

**10 A. "Long live Mike."**

11 Q. So this is the song that your son wrote, and the

12 lyrics -- correct me if I'm wrong with some of the

13 lyrics -- "Hit him in his kidney. Now he fucking

14 bleeding. Slide down his block. Some young, wild

15 niggas is down to slide. Real disrespect as pointing

16 up. Fuck that dead nigga in the sky. I don't fuck

17 with opps because I be shooting at them. I be out

18 patrolling, trying leave a nigga head open. Free my

19 nigga Kodak. Me and Mike got hops out and straight up

20 to your brain."

21 Is this how -- who are these opps that

22 they're talking about shooting and opening up their

23 brain and all that? Is it -- it starts with the

24 officers.

25 MR. ROBINSON: Did she write the song?

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1 MS. OLMSTEAD: I'm asking if you know.  
 2 **THE WITNESS: I don't know.**  
 3 BY MS. OLMSTEAD:  
 4 Q. Are they talking about shooting officers?  
 5 **A. That song was made way before that. I don't know.**  
 6 Q. Okay. So is this indicative of how -- the lyrics, are  
 7 they indicative of how Michael was living if that's  
 8 what he's writing about, shooting opps?  
 9 MR. ROBINSON: I think that's argument.  
 10 BY MS. OLMSTEAD:  
 11 Q. Do you know, was he shooting opps and sliding the  
 12 block?  
 13 **A. No.**  
 14 Q. Okay. So they're not actually doing this. They're  
 15 just making a video, glorifying violence and killing?  
 16 MR. ROBINSON: Next question.  
 17 BY MS. OLMSTEAD:  
 18 Q. Would you agree that is glorifying killing? Young,  
 19 Black men killing other young Black men?  
 20 MR. ROBINSON: Next question.  
 21 BY MS. OLMSTEAD:  
 22 Q. That's this genre. Would you agree?  
 23 MR. ROBINSON: Next question. Next  
 24 question.  
 25 MS. OLMSTEAD: Again --

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1 MR. ROBINSON: Do you have a next question?  
 2 MS. OLMSTEAD: -- you're instructing her  
 3 not to answer this question, another question.  
 4 MR. ROBINSON: Next question.  
 5 BY MS. OLMSTEAD:  
 6 Q. And you are in this video. You're making shooting  
 7 motions with these other -- you're the only woman in  
 8 the video that I saw. Correct?  
 9 **A. Correct.**  
 10 Q. And you're making shooting -- shooting at the opps  
 11 motions as well, the mother. Yes?  
 12 **A. I don't know the question.**  
 13 Q. Were you make shooting motions as well within the  
 14 video --  
 15 **A. Yes, I was.**  
 16 Q. -- along with the -- and you don't see this as  
 17 glorifying gun violence?  
 18 MR. ROBINSON: You don't have to answer  
 19 that.  
 20 MS. OLMSTEAD: I guess it's pretty a  
 21 obvious answer. You don't have to answer it.  
 22 BY MS. OLMSTEAD:  
 23 Q. You also talk a lot about being Michael's friend.  
 24 Were you friends with all of his other little friends,  
 25 too? That's why you're --

1 **A. No.**  
 2 Q. You posted, "Mike was a really good kid, and DPD took  
 3 away a really good kid." How do you define a good  
 4 kid?  
 5 **A. Is there another way to ask that question?**  
 6 Q. Do good kids --  
 7 MR. ROBINSON: You know you don't have to  
 8 answer. I see where she's going.  
 9 BY MS. OLMSTEAD:  
 10 Q. You're gonna testify at trial -- right? -- and talk  
 11 about how Mikey was such a wonderful child and such a  
 12 great kid and how much you miss him; right?  
 13 **A. That's the question?**  
 14 Q. Are you planning on doing that at trial?  
 15 **A. If I'm called to testify.**  
 16 Q. Okay. So I want to know, like, how you define a good  
 17 kid.  
 18 **A. I don't know.**  
 19 Q. He's good 'cause he's your son?  
 20 MR. ROBINSON: This is argument. You don't  
 21 have to answer that.  
 22 MS. OLMSTEAD: Okay. Well, I think I'm  
 23 about done here. I'm going to consult with Officer  
 24 Jetter real quickly and. . .  
 25 (Off the record at 12:36 p.m.)

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1 (Back on the record at 12:44 p.m.)  
 2 BY MS. OLMSTEAD:  
 3 Q. All right. This'll be -- we'll mark this as 10. This  
 4 is another Instagram post from August the 15th, I  
 5 believe, of 2021, from Ms. -- from you. The last part  
 6 of the paragraph says, "How can the police be  
 7 detrimental to the community than the people they  
 8 claim to protect us from, then lie to hide the fact  
 9 that they worse than the gangs. Most of the gangs are  
 10 respectful and honorable and give back, and more  
 11 importantly, they take responsibility for what they  
 12 do." Here, you can take a look at it. What gangs are  
 13 you referring to?  
 14 MARKED BY THE REPORTER:  
 15 DEFENDANTS' EXHIBIT 10  
 16 12:45 p.m.  
 17 MR. ROBINSON: Let me. . . Okay.  
 18 MS. OLMSTEAD: Okay.  
 19 BY MS. OLMSTEAD:  
 20 Q. So I'll rephrase that. It sounds like, from that  
 21 post, that you have personal knowledge of gangs. Is  
 22 that correct?  
 23 **A. That's not correct.**  
 24 Q. Okay. So what did you mean by that post?  
 25 **A. Gangs could be any form of people, not necessarily a**

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1 gang, per se.  
 2 Q. What do you mean "gang, per se"?  
 3 A. We could be considered a gang. It's five or more  
 4 people in here.  
 5 Q. Okay. So -- but why were you referring to them,  
 6 they're "worse than the gangs?" Doesn't that imply  
 7 that you're talking about, like, street gangs?  
 8 A. It could be implied to you any way. It could be  
 9 anything. A gang is people.  
 10 Q. So do you have -- you live -- are there gangs in  
 11 your -- in your complex, your area?  
 12 A. No.  
 13 Q. No? No gang members? Would it surprise you to know  
 14 that -- I'm sorry. Let me go back. I'm not gonna  
 15 look for the post, but you referred to -- what's his  
 16 name? -- MTB Pocc as your son in one of the posts;  
 17 correct?  
 18 A. Yes.  
 19 Q. And wished him a happy birthday. You said he was  
 20 happy that he's in your life now. And he was good,  
 21 close friends with Mike; right?  
 22 A. Yes.  
 23 Q. Would it surprise you to know that he's well-known to  
 24 homicide detectives as a gang member?  
 25 MR. ROBINSON: What is that relevance?

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1 BY MS. OLMSTEAD:  
 2 Q. Would it surprise you?  
 3 A. Yes.  
 4 Q. And he's known as a shooter?  
 5 MR. ROBINSON: It is irrelevant.  
 6 BY MS. OLMSTEAD:  
 7 Q. Access to guns, perhaps?  
 8 MR. ROBINSON: Next question.  
 9 BY MS. OLMSTEAD:  
 10 Q. Mikey's access to guns? He's got friend that are  
 11 known --  
 12 MR. ROBINSON: Next question.  
 13 You don't have to answer that.  
 14 Next question.  
 15 MS. OLMSTEAD: Did we mark that one? We'll  
 16 just mark it as 11 and say, for the record, that's the  
 17 picture.  
 18 Give me one more second. I think I'm done.  
 19 MARKED BY THE REPORTER:  
 20 DEFENDANTS' EXHIBIT 11  
 21 12:50 p.m.  
 22 (Off the record at 12:50 p.m.)  
 23 (Back on the record at 12:51 p.m.)  
 24 BY MS. OLMSTEAD:  
 25 Q. One final question. Ms. Curtis, you -- do you control

1 and own the 313 Long Live Mike post -- I'm sorry --  
 2 Instagram page?  
 3 A. Now I do.  
 4 Q. Now you do? Okay. Before, that was his; right?  
 5 A. Yes.  
 6 Q. Okay. So we have a post from March the 4th of 2022.  
 7 He was already deceased at that point; right? And did  
 8 you write this post?  
 9 A. No, I don't believe I wrote that.  
 10 Q. Okay. Fair enough. Who would have had access to it?  
 11 Who would have had access to that page in order to  
 12 write that?  
 13 A. I don't know.  
 14 Q. So it says, "Happy heavenly 20 to me. Can't nobody or  
 15 nothing take away from the shine I had here on earth,  
 16 but I'm for damn sure balling in heaven. Ain't shit  
 17 to a gangster, not even this. If I love you, I mean  
 18 it. BandUp, MTB, Buffalo Projects." What's the  
 19 Buffalo Projects?  
 20 A. That's the townhomes I live in.  
 21 Q. Okay. That's government housing projects, or you just  
 22 call it "projects"?  
 23 A. It's called projects, I guess. I don't know.  
 24 Q. Okay. Is BandUp a gang?  
 25 A. No.

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1 MR. ROBINSON: She didn't write it.  
 2 MS. OLMSTEAD: I'm just asking does she  
 3 know.  
 4 BY MS. OLMSTEAD:  
 5 Q. And MTB, Made to Ball, that's not a gang, to your  
 6 knowledge?  
 7 MR. ROBINSON: She didn't write it.  
 8 BY MS. OLMSTEAD:  
 9 Q. You're familiar with MTB and BandUp, though; correct?  
 10 MR. ROBINSON: She didn't write it.  
 11 MS. OLMSTEAD: It doesn't matter. I'm  
 12 asking her about that.  
 13 BY MS. OLMSTEAD:  
 14 Q. You're familiar with MTB; right?  
 15 THE WITNESS: Do I answer that?  
 16 MR. ROBINSON: If you know.  
 17 THE WITNESS: I'm familiar with the MTB.  
 18 BY MS. OLMSTEAD:  
 19 Q. And that means Made to Ball?  
 20 A. I don't know.  
 21 Q. Who all uses that MTB -- like, who uses that, that you  
 22 know of? Is it from your neighborhood?  
 23 A. I don't know who all uses it.  
 24 Q. Would you have any reason to dispute or -- if I told  
 25 you that's also known as a gang to Detroit Police?



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1 MR. ROBINSON: You don't -- you don't have  
2 to answer that.

3 MS. OLMSTEAD: Another question you're  
4 instructing her not to answer?

5 MR. ROBINSON: You're arguing. You're not  
6 asking --

7 MS. OLMSTEAD: I'm asking her questions.

8 MR. ROBINSON: You're nasty. That's all  
9 you're trying to do.

10 MS. OLMSTEAD: Okay. Thank you so much,  
11 Ms. Curtis, for your time. I don't have anything  
12 further.

13 (The deposition was concluded at 12:54 p.m.  
14 Signature of the witness was not requested by  
15 counsel for the respective parties hereto.)  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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1 CERTIFICATE OF NOTARY

2 STATE OF MICHIGAN )

3 ) SS

4 COUNTY OF OAKLAND )  
5

6 I, Susanne Ellen Gorman, a Notary Public in  
7 and for the above county and state, do hereby certify  
8 that the above deposition was taken before me at the  
9 time and place hereinbefore set forth; that the  
10 witness was by me first duly sworn to testify to the  
11 truth and nothing but the truth; that the foregoing  
12 questions asked and answers made by the witness were  
13 duly recorded by me stenographically and reduced to  
14 computer transcription; that this is a true, full, and  
15 correct transcript of my stenographic notes so taken;  
16 and that I am not related to, nor of counsel to either  
17 party, nor interested in the event of this cause.  
18

19 

20  
21 Susanne Ellen Gorman, CSR-9271, RPR  
22 Notary Public,  
23 Oakland County, Michigan.  
24

25 My commission expires: September 14, 2023

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# EXHIBIT D



**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

CRYSTAL CURTIS, Duly Appointed  
Personal Representative for the Estate  
of Michael Contrell Adams, deceased,

Plaintiffs,  
v.

CASE NO. : 21-12342  
HON. Shalina D. Kumar

CITY OF DETROIT, a municipality  
CHIEF JAMES WHITE, POLICE OFFICER  
JEJUAN JETTER AND POLICE OFFICER  
EUGENE FIELDER,  
in their individual and official capacities,  
Jointly and Severally,

Defendants.

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**DAVID A. ROBINSON (P38754)**  
**BRANDON MCNEAL (P81300)**  
ROBINSON & ASSOCIATES, P.C.  
Attorneys for Plaintiff  
28145 Greenfield Rd., Suite 100  
Southfield, MI 48076  
(248) 423-7234  
[davidrobinsonlaw@gmail.com](mailto:davidrobinsonlaw@gmail.com)  
[mcnealbr@gmail.com](mailto:mcnealbr@gmail.com)

**THOMAS E. KUHN (P37924)**  
Co-Counsel for Plaintiff  
1595 Pebble Point Drive  
Troy, MI 48085  
313.963.522; fax 313.963.9061  
[tekuhn@aol.com](mailto:tekuhn@aol.com)

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**CRYSTAL B. OLMSTEAD (P69202)**  
CITY OF DETROIT LAW DEPART  
Attorneys for Defendant City of Detroit  
2 Woodward Avenue, 5<sup>th</sup> Floor  
Detroit, MI 48266  
(313) 237-5035 Direct  
(313) 237-3078 (Sec Linda Rucker)  
[olmsteadc@detroitmi.gov](mailto:olmsteadc@detroitmi.gov)  
[ruckerli@detroitl.gov](mailto:ruckerli@detroitl.gov)

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**PLAINTIFF'S RESPONSES TO DEFENDANTS INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

## **INTERROGATORIES**

1. Please indicate the following information:
  - A. Plaintiff's Full name, including middle name;
  - B. Present residence address and address at time of incident that is the subject of this litigation if different from current address
  - D. Current telephone number and number at time of incident that is the subject of this litigation if different from current phone number

**ANSWER:** Crystal Curtis, who may be contacted through counsel's office.

2. Please identify any witnesses you are aware of that witnessed the shooting of Michael Adams that you intend to produce for trial.

In reference to each witness state the following:

- A. Full name, current address, and telephone number of each witness
- B. How you became aware of this witness
- C. What the witness claims that he/she/they observed

**ANSWER:** Defense counsel has deposed both Brooklyn Ostrowski and Jacob Pratt and has their contact information. Defense counsel also has Christopher Harris's contact information. Defense knows what these witnesses testimony may be as it is contained in deposition or police report. As discovery is continuing other witnesses will be identified. Defense can reference Plaintiff's witness list for the names of proposed witnesses.

3. Please identify and provide the address and telephone number for any bystanders that you intend to produce for trial that were in the area of the shooting that claim to have been almost shot or in the line of fire during the shooting that is the subject of this litigation as described by Plaintiff's counsel during the Deposition of Raymond Diaz on August 15, 2022

**ANSWER:** See answer to Plaintiff's response to Defendants' request for admission.

4. Please identify whether the deceased Michael Adams was employed at the time of the subject incident and provide the address and telephone number for the employer.

**ANSWER:** Michael Adams, III was not employed at the time of this incident.

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

#### **REQUEST FOR PRODUCTION NO. 1:**

Please produce any and all photographs taken by you, on your behalf, or in your possession and/or in the possession of a representative on your behalf depicting anything relevant to the incident involving Plaintiff as alleged in the Complaint filed with regard to the above-captioned matter, including but not limited to, photographs of Plaintiff, the scene where the accident occurred, the vehicles involved in the accident, etc.

**RESPONSE:** N/A

#### **REQUEST FOR PRODUCTION NO. 2:**

Please produce an itemized Bill of Particulars setting forth specifically and in detail each and **every expense claimed by Plaintiff to be payable by**

**Defendant**, together with the nature and amount of such item(s), and the person(s) to whom such amount(s) have been paid or to whom such indebtedness exists together with all documents establishing that those expenses have been incurred; Defendant hereby gives notice that, upon failure of Plaintiff to timely furnish same within due course, Defendant will ask to have this case dismissed because of such failure.

**RESPONSE:** \$10,590.00 funeral related expenses

**REQUEST FOR PRODUCTION NO. 3:**

Please produce a complete copy of the deceased Michael Adams income tax returns for the last five years.

**RESPONSE:** Will provide upon properly drafted release

**REQUEST FOR PRODUCTION NO. 4:**

Please produce a **copy of any and all bills from each medical provider incurred by**, or on behalf of, the deceased Michael Adams or Plaintiff for injuries/damages sustained in the subject incident.

**RESPONSE:** N/A

**REQUEST FOR PRODUCTION NO. 5:**

**Please produce signed, notarized record copy authorizations for each entity identified below. (Blank authorizations are attached. Photocopy additional authorizations as needed).**

- A. Any employer of the deceased Michael Adams or Plaintiff Crystal Adams within from January 1, 2020 to present.
- B. Each and every **doctor, hospital, clinic, or other health care provider or facility at which Crystal Curtis have ever been examined, evaluated, or treated for injuries either physical or mental she relates to the subject incident.**
- C. Each and every **doctor, hospital, clinic, or other health care provider or facility at which Michael Curtis has ever been examined, evaluated, or treated from January 1, 2020 through August 31, 2021 for either mental or physical conditions.**
- D. Each and every high school, university, trade school, and college Michael Adams attended
- G. **Social Security Administration for Crystal Curtis and Michael Adams**

**RESPONSE:** Will provide upon receipt of properly drafted releases

David A. Robinson (P38754)  
Attorneys for Plaintiff  
28145 Greenfield Road, Ste. 100  
Southfield, Michigan 48076  
(248) 423-7234

Dated: September 18, 2022

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing ***Plaintiff's Responses To Defendants Interrogatories And Request For Production Of Documents To Plaintiff*** was served upon all parties to the instant action by enclosing copies of same in sealed envelopes, clearly addressed to their respective attorney(s) addresses of record as disclosed by the pleadings herein, with sufficient prepaid First-Class postage affixed thereto, and depositing said envelopes in the U.S. Mail in Southfield, Michigan, on **September 18, 2022.**

/s/ Cheryl Watson  
Cheryl Watson